

# Sonoma County Community Development Committee



**Human Services Dept. Representative:** Oscar Chavez (Chair), **Tenant Representatives:** Stephanie Hiller, Jessica Vega  
**1<sup>st</sup> Dist:** Betzy Chavez (Vice Chair) **2<sup>nd</sup> Dist:** Michael Regan **3<sup>rd</sup> Dist:** Susan Hollingsworth Adams **4<sup>th</sup> Dist:** Willie Lamberson  
**5<sup>th</sup> Dist:** Linda Garcia **Interim Executive Director:** Barbie Robinson, CHC, JD, MPP

Public Meeting  
Wednesday, October 21, 2020  
10:00am-11:30am

*This meeting will be held virtually to comply with the Governor's Executive Order N-29-20. Please see page 2 for instructions on making public comment*

**MEMBERS MAY NOT ATTEND THIS MEETING IN PERSON**

**Zoom:**

<https://sonomacounty.zoom.us/j/99739940542?pwd=ZWRvSIA0Vk9OaUNJU1RzY1p5dWFTZz09>

**Passcode: 009102**

**Meeting ID: 997 3994 0542**

**Phone: +1 669 900 9128**

## Agenda

- 1. Call to Order and Roll Call, 5 minutes**
- 2. Public Comments for Items Not on the Agenda, 10 minutes**
- 3. Approval of Minutes from August 19 and September 16 Meetings, 5 minutes**  
The Committee will discuss and may take action to approve the minutes from August 19, 2020 and September 16, 2020 or may recommend changes to these minutes.
- 4. Fair Housing Assessment Equity Report, 20 minutes**  
Guest Ana Lugo will provide a presentation of the Fair Housing Assessment/Equity Report.
  - a) Memo 4a – Fair Housing Assessment Report
- 5. Interim Executive Director's Report, 15 min**  
Staff will provide updates regarding the following topics.
  - a) Bylaws and Ordinance
  - b) VASH vouchers
  - c) Mainstream Vouchers
  - d) Rental Assistance
  - e) COVID-19
  - f) 100 Day Challenge
  - g) CoC/Leadership Council Update
- 6. Public Hearing: 2020 Action Plan Substantial Amendment, 5 min**  
Martha Cheever will present on proposed changes to the 2019-2020 Action Plan to allow for



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\$1,854,351 of CDBG-CV3 funds to be combined with CDBG-CV1 funds to administer a rental assistance program for tenants and landlords who have been medically or economically impacted by COVID-19 or the Eviction Defense Ordinance.

- a) Open public hearing
- b) Close public hearing
- c) Committee Discussion
- d) Make Motion or Change Recommendation
  - a. Memo 6a – CDC CDBG-CV Round 3
  - b. BOS Resolution – 6b

### 7. No Place Like Home (NPLH), 5 minutes

Darrin O’Hara will present information regarding the NPLH Round 3 funds and the two projects the Commission has selected to co-sponsor.

- a) Memo 7a – NPLH

### 8. 2021-2022 Funding Policies, 10 minutes

Assistant Director Tina Rivera will present a redlined version of 2021-22 Federal Funding policies based on Committee conversation from the August meeting.

### 9. Flood Elevation, Marc Chandler, 15 minutes

Staff Marc Chandler will provide an update regarding Flood Elevation.

### 8. Adjournment

#### Next Regular Meeting

**November 18, 2020**

**10:00 am**

Virtual

**PUBLIC COMMENT PRIOR TO THE COMMITTEE MEETING:** Public Comment may be submitted via email to [Darrin.O’Hara@sonoma-county.org](mailto:Darrin.O’Hara@sonoma-county.org).

**PUBLIC COMMENT DURING THE BOARD MEETING: PUBLIC COMMENT USING ZOOM:** Members of the public who join the Zoom meeting, either through their web browser online or by calling in, will be able to provide live public comment at specific points throughout the meeting. One may also email public comment to [Darrin.O’Hara@sonoma-county.org](mailto:Darrin.O’Hara@sonoma-county.org) throughout the



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meeting. All emailed public comments will be read into the record.

Any writings or documents presented to a majority of the Community Development Committee regarding any item on this agenda may be made available for public inspection in the Sonoma County Community Development Commission office located at 1440 Guerneville Road, Santa Rosa, CA 95403 during normal business hours.

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5<sup>th</sup> Dist: Linda Garcia  
Interim Executive Director: Barbie Robinson, CHC, JD, MPP

## Public Meeting Concurrent with the Cities & Towns Advisory Committee

Wednesday, August 19, 2020  
10:00am-11:30am

### Minutes

#### 1. Call to Order and Roll Call

Chairs Oscar Chavez and Stephen Sotomayor called the meeting to order.

CD Committee attendees: Susan Hollingsworth-Adams, Stephanie Hiller, Willie Lamberson, Betsy Chavez, Linda Garcia and Oscar Chavez

Absent: Jessica Vega, Michael Regan

CTAC attendees: Healdsburg, Stephen Sotomayor; Rohnert Park, Jenna Garcia; Cloverdale, Kevin Thompson; Cotati, Craig Scott; Sebastopol, Kari Svanstrom

Absent: Town of Windsor

#### 2. Public Comments for Items Not on the Agenda

No public comments

#### 3. Approval of Minutes from July 15, 2020 Meeting

Susan Hollingsworth-Adams motioned to approve the minutes, Betsy Chavez seconded.  
None opposed.

#### 4. Interim Assistant Director's Update

Tina Rivera, Interim Assistant Director (AD), provided an update regarding the COVID-19 pandemic. Almost 2,000 cases currently with an increase of 200 in one day. We've tested 90,000 of Sonoma County residents. Skilled Nursing Facilities (SNFs) and Residential Care facilities have experienced the most deaths. We are working on a regional model plan for working with these facilities to help them combat the COVID-19 outbreaks. Senator McGuire's office has been helping.

We've moved the Non-Congregate Shelter (NCS) from Sonoma State University (SSU). We are using Astro Motel at capacity and Alliance Redwoods at near capacity, as well as using trailers from the states at the Fairgrounds. We had to evacuate West County's navigation site due to the fire last night and they are now in Lot B at the Fairgrounds. We have 26



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patients receiving medical care at the Alternative Care Site (ACS) at the Best Western in Healdsburg.

The governor has made state funds, Project Room Key, available to pay for motel, hotel rooms and vacant apartments to rent or purchase properties for NCS. We have submitted applications and the funds need to be spent by the end of December. We'll hear about our application in mid-September.

Chair Chavez asked if Alliance Redwoods is at risk of evacuation. AD Rivera responded that we are keeping our eye on it. The ACS is also on the edge of the evacuation zone. Not just the fire to consider but the complication of COVID-19 considerations. Evacuation shelter sites have been identified and are being prepared.

Rohnert Park, Jenna Garcia asked if hotels going to be temporary housing or permanent housing. AD Rivera referred her to Diedre Duncan, our new Housing and Neighborhood Investments Manager, as she completed the application.

#### **5. Plan: CDBG-CV and ESG-CV**

AD Rivera presented the plan for the implementation of a rental-assistance program for vulnerable households impacted by COVID-19 using CARES Act CDBG-CV funds and implementation of various CARES Act homeless programs using ESG-CV funds. We are working at the direction of the Board of Supervisors and the County Administrator's Office to set up the rental assistance program.

County Counsel has issued a statement that for CRF monies that immigration status will not need to be established. It is possible more than one contractor will be used to ensure money is spent in a timely manner. Can be used for rent or utility bills both past due and current. Will need to be certified that the reason they were not able to pay is due to COVID-19

CDBG-DR funds will begin in January 2021 as they are not subject to the same timeliness requirement.

#### **ESG-CV**

\$8.3m in funds from HUD and HCD and Home Sonoma County Leadership Council will be the final decision maker. The CDC is recommending the money be used for:

- Rapid Rehousing
- Emergency Shelter Augmentation
- Non-congregate Shelter Operations (Astro Motel, Dry Creek Inn, Redwood Alliance as well as Los Guilicos)
- Street Outreach – ensure maximum outreach and coordinate with community partners

- Commission Staffing – need to increase staffing to meet these needs, recommending the implementation of four 2-year positions. HMIS, contracting, housing navigation, etc.

CD Committee and CTAC members asked clarifying questions about the specific amounts going to each program and what the plans are when Los Guilicos closes. AD Rivera clarified the amounts and mentioned that we are working on a plan for closing Los Guilicos. The Board of Supervisors is still discussing the timing.

CTAC members asked about how we are going to certify the CDBG-CV funds are going to people who lost income due to COVID. The certification is going to utilize the same criteria as the eviction defense ordinance. Some community-based organizations will assist in dispersing the funds countywide.

## **6. Discussion: FY 2021-22 Funding Policies**

This is our regular annual discussion regarding the funding policies. The staff is looking at HNI CDBG and HOME funds as well as CDGB-DR multi-family housing program.

A mock-up draft with proposed changes will come before Committees in October.

Staff is asking the Committee for any changes to funding priorities and preferences, such as considering climate change, prevent displacement, timeliness, clarify terms and purposes of policies, describing processes. Feedback can be sent after the meeting to [holly.kelley@sonoma-county.org](mailto:holly.kelley@sonoma-county.org).

Chair Chavez commented that it is helpful to develop a priority matrix for our preferences as there are so many. How do we want to rank those priorities?

Linda Garcia commented that many people can use a bike lane to get to work, but there is a whole community of people who don't drive anywhere.

Willie Lamberson asked that we emphasize projects that are public/private joint ventures like we're doing with the Water Agency project where we are retaining some equity. Buying hotels is good immediate solution but doesn't make sense in the long term. Taxes, insurance, security, maintenance, repairs, etc. go along with purchasing a motel. Would rather identify some properties and work with other jurisdictions or non-profits to acquire/develop properties.

Several members asked clarifying questions.

Sebastopol, Kari Svanstrom also suggested we prioritize retaining moderate income stakeholders. Land Trust in the moderate range to keep teachers and hospital staff and other key personnel to keep moderate income from having to leave. Holly Kelley

responded that we do want to balance funding, for instance, last year we funded some workforce housing.

**7. Update on County Fund for Housing Policies**

Angela Morgan, Affordable Housing Finance Associate, provided a brief explanation of the funding policies for the County Fund for Housing. There are no proposed changes, so she gave a bit of background on the fund.

County established the funding in 2003 to provide financial assistance for the development and preservation of affordable housing both rental and ownership housing projects. Staff determines whether the applications are in line with policies approved by the Board. Funds are awarded in a 30-year secured loan. We issue a Notice of Funding Availability (NOFA) and invite developers and other eligible contractors to apply. This year will be about \$2M augmented with ~\$850K from Public Housing funds.

We will be presenting the applications to the combined committees. Last year we awarded three projects and are looking forward to seeing what we will get this year.

AD Rivera also introduced our new Housing and Neighborhood Investments Manager, Diedre Duncan, to the Committee.

**8. Update: CDBG-DR Notice of Funding Availability**

Assistant Director Tina Rivera presented an update on the proposed release of a Notice of Funding Availability for Block Grant funds allocated to the County from the 2017 fires. We are in assembling our due diligence for the state, updating our funding and loan policies as needed for adhering to the CDBG-DR requirements. The next step is to solicit a consultant to help with these rewrites. There are \$4.9 m for these funds which will be used for a multi-family housing program.

**CTAC meeting adjourned.**

**9. Update: CD Committee Ordinance Changes Update**

Continuation of conversation regarding the Board of Supervisors' direction for the CD Committee Ordinance. The proposed changes will not change the scope of the existing body of work that the Committee oversees, but will help delineate and clarify responsibility for Committee members and staff in relation to Commission programs and funding sources.

Changes were made incorporating the changes to the CD Committee Ordinance feedback in the last meeting.

Willie Lamberson questioned the exclusion of the word "all" regarding the matters that would come to the CD Committee. He quoted the bylaws which say, "to review and make

recommendations on **all** matters before commission...” He would like to ensure the ordinance clarifies that the CD Committee is the Housing Authority and Home Sonoma County is the homeless committee.

County Counsel (CC) Alegria de la Cruz responded that the word “all” could be a catchall, and we are working to lay out the responsibilities with more specificity of the responsibilities of the CD Committee and Leadership Council and to provide clarity in making clear the current distinctions.

Stephanie Hiller questioned why these two functions were separated and asked what our relationship with the Health Department is now.

CC de la Cruz responded that relationship of the CDC and the DHS is not legally set up yet, but they do share a director and assistant director as directed by the Board of Supervisors as the agencies are part of the larger safety net.

Stephanie Hiller mentioned the grand jury report that recommended merging the DHS and CDC.

CC de la Cruz responded that the CDC is a requirement of a state statute and cannot be merged with DHS per the statute.

The update of the ordinance and bylaws are to clarify the responsibilities assigned by the Board and other jurisdictions in the county area. One of the main concerns was that homelessness affected all jurisdictions in the county and the Board wanted to combine efforts to create a more effective response.

Willie Lamberson commented that Article 6 of the bylaws, Section 1 regarding amending bylaws, requires being voted on by the CD Committee.

AD Rivera stated that there are no proposed changes to bylaws currently. Ordinance will line up with bylaws.

Oscar asked staff to do a little more research on the roles of the CD Commission, the Committee and the Leadership Council and adding the word “all” and supporting the work of the Commission.

Betzy Chavez agrees with inclusion of the word “all.” She also mentioned concerns with the staffing turnover and the shared directorship of the CDC and DHS. Her concern is regarding the responsibility we have to ensure we are able to fulfill our obligations to the community.

AD Rivera responded that the Board made a decision to combine the directorship as there are several programs that have significant integration. She reminded the Committee that of their focus on policies not the operations.



She mentioned some concern that if the word “all” were added back in, that there may be some implication there of operations oversight. We have heard your concerns and noted them.

Stephanie Hiller commented that she doesn’t share the previously stated concerns. She wants the Committee to weigh in on policies and staff reports, as well as be a bridge between the CD Committee and the community. What is the purpose of the CD Committee? She would like her time here to go to the community in a more direct way than she’s observed.

Chair Chavez agrees with AD Rivera about operations not the Committee’s purview. Clarity on the Committee’s purpose would be great and greater engagement with the public. He suggested more time on this item.

CC de la Cruz mentioned that this is her last time in our meeting as our lawyer as she’s stepping into a role as Interim Director of Equity with Sonoma and will be doing that for the next several months.

Linda Garcia suggested that this topic needs to be discussed at the beginning of the agenda.

No public comment on #9

#### **10. Discussion: Role of CD Committee**

As the meeting was over time. Chair Chavez suggested Item 10 to be tabled and moved to the next meeting.

#### **11. Adjournment**

Susan Hiller motioned, Stephanie Hiller seconded adjournment. None opposed.

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## Public Meeting Concurrent with the Cities & Towns Advisory Committee

Wednesday, September 16, 2020  
10:00am-11:30am

### Minutes

#### 1. Call to Order and Roll Call

Chairs Oscar Chavez and Stephen Sotomayor called the meeting to order.

CD Committee attendees: Stephanie Hiller, Susan Hollingsworth-Adams, Willie Lamberson, Betzy Chavez, Michael Regan, Linda Garcia and Oscar Chavez

Absent: Jessica Vega

CTAC attendees: Healdsburg, Stephen Sotomayor; Rohnert Park, Jenna Garcia; Cloverdale, Kevin Thompson; Cotati, Craig Scott; Sebastopol, Kari Svanstrom; Town of Windsor, Jessica Simpson

Absent: Sonoma

#### 2. Public Comments for Items Not on the Agenda

No public comments.

#### 3. Approval of Minutes from August 19, 2020 Meeting

The Committee will approve the August minutes in the October meeting.

#### 4. Public Hearing: 2020 Action Plan Substantial Amendment

Opened Public Hearing.

Martha Cheever, Housing Authority Manager, and Holly Kelley, Administrative Aide, presented this item. The CHDO set aside requirement was waived by HUD. In last round, no applications received for it, so we were saving for next round, but as the waiver is now available we'd like to utilize the funds.

Staff proposes moving the \$134,401 in set-aside funds to supplement the Tenant-Based Rental Assistance (TBRA) program and provide two additional years of rental assistance for approximately 12 vulnerable senior households. Without funding, rental assistance for households would end December 2020 and they would likely become homeless and need to be housed in a Non-Congregate Shelter (NCS) situation. The Board approved this



amendment on June 2<sup>nd</sup>.

No CD Committee comments. Opened for Cities & Towns Advisory Committee (CTAC) comments.

Sebastopol, Kari Svanstrom, asked if there had been any discussion with landlords to negotiate as all households are in the same apartment complex.

Ms. Cheever replied that the landlord has negotiated substantially lowered rents and taken on some utilities.

Rohnert Park, Jenna Garcia, commented that this is a short term solution and asked if there are any funding sources for longer term/permanent?

Ms. Cheever responded that these tenants are slightly over the qualification for the PCV program, but we are working to move people into that program.

Healdsburg, Stephen Sotomayor, asked how long is HUD waiver good for?

Holly Kelley, Administrative Assistant replied that the waiver only applies to the 2019 and 2020 funds so far. No reply yet on 2021.

Susan Hollingsworth-Adams asked why is this program for only 12 households?

Ms. Cheever replied that 12 is the number of people who are having their assistance end in December. We are phasing this program out.

Stephanie Hiller asked about moving the people onto PCV as that is normally done by lottery?

Ms. Cheever replied that normally PCV is assigned by lottery, but preference is given if the tenant's source of funding is lost. They can then be put in the PCV program without the lottery.

Assistant Director (AD) Tina Rivera noted this is Holly Kelley's last meeting and we will be recruiting for her position. We have also selected a consultant for the analysis of the agencies although there is some delay due to the fires.

##### **5. Update: CARES Act Emergency Rental Assistance Awards**

Staff will present a summary of applications and recommendations for the CARES Act Emergency Rental Assistance Notice of Funding Availability

We've been working with County Administrator's Office using the Coronavirus Relief Fund.

This fund is designed to serve low income tenants who were affected by CV-19. Legal Aid will receive \$123,000. We also released a Notice of Funding Availability (NOFA) for which we received 7 eligible applicants for Rental Assistance program. The Review Committee has made recommendations to the Director and then it will move on approval by the Board of Supervisors. The applicants did great job of being cognizant of 10% admin fee, but some took less as wanted to free up some of the money to the public. Staff will be coming back to report on these awards once the recommendations have been approved.

Chair Chavez commented that we mentioned the administrative cost percent is lowered. Was it voluntary? He also stated he knows how important it is to have admin funds to facilitate spending. Is CDC/County also reducing its admin percentage?

AD Rivera responded that the administrative cost percentage lowering was voluntary and that the CDC is not taking an administrative cost percentage.

#### **6. Discussion: CD Committee Ordinance Changes**

AD Rivera provided a memo in the agenda packet and the included PowerPoint also included the reasons for the proposed changes to clarify the role of the Committee as related to committees that may overlap duties as well as staff's role.

In the previous meeting some members of the Committee suggested including the word "all" in regards to the areas of responsibility. AD Rivera emphasized that the proposed wording changes have no impact on existing responsibilities of CD Committee. The changes to the ordinance are merely shoring up what the Committee is already doing. The Board of Supervisors requested that the language in the ordinance be specific on the definition of duties.

Willie Lamberson again expressed concern that if we don't use the word "all" then doesn't give the Committee flexibility. Please refer to the agenda packet from the July 15<sup>th</sup> meeting for the exact wording. For example, Project Home Key which bought a hotel to house homeless folks, which should have come before the Committee for review. What do fellow committee members think about this?

Chair Chavez responded with the example of Project Turnkey which is a homelessness project, but also falls into development.

Mr. Lamberson responded that Project Home Key is development, Project Room Key is more of a shelter.

AD Rivera responded that these projects fall under emergency matters, so would fall under the Emergency Act rather than either committee. The "all" wouldn't have pertained here as the money had to be spent in 3 months, so would not follow the normal approval process.

Mr. Lamberson appreciated the clarification and noted that at the end of the paragraph it

does say that it excludes emergency matters. Your concerns are noted in this paragraph. Just think that not putting the word “all” in the wording limits the CD Committee’s flexibility.

AD Rivera mentioned that the policies and responsibilities are not changing but the wording of the ordinance is being amended to specify each Committees scope for clarity.

Stephanie Hiller suggested that maybe this issue is not just about one word but just a shift in direction. What meant by “program improvement and project advocacy?” What does that consist of?

AD Rivera responded that it is included administrative policy what the roles of the advisory body is. One of the things the advisory body does not do is operations, that is not in the purview of the Committee. The Committee’s purpose is to review, assess and make recommendations and comments to the Board of Supervisors as appropriate on disbursing funding. Read administrative policy what is not role of committee.

Ms. Hiller stated that program improvement sounds good, but she is worried that project advocacy would be sort of a public relations role? Do support our projects and want to be endorse them in the community, but would there be more to it than that? Is this also to act as a conduit to the public? Why was committee created in the first place? Could not find that history.

Martha Cheever, Housing Authority Manager stated that the CD Committee is statutorily required for the Housing Authority, tenant representatives are not on the Board of Supervisors, so each Board member appoints someone and Housing Authority them makes recommendations to tenant representatives.

Susan Hollingsworth-Adams asked if the Board of Supervisors requested that the word “all” be removed? Who votes to make the by-laws final, the Board of Supervisors or CD Committee?

AD Rivera responded that it was the Board’s direction to clarify roles of this Committee, Leadership Council, Consolidated Oversight Board and CD Executive Leadership. Board of Supervisors makes final decision of the ordinance.

Ms. Hollingsworth-Adams asked if the CD Committee has a say in this decision?

AD Rivera replied “Yes, we take your advice and recommendations to the BOS.”

Willie Lamberson also responded to Ms. Hollingsworth-Adams by sharing the original Board of Supervisor’s notes from 1984. The CD Committee changes the by-laws. The Board of Supervisors changes the ordinance.

AD Rivera noted that we are not proposing any changes to the by-laws

Mr. Lamberson noted that the by-laws need to line up with ordinance

Chair Chavez responded to Mr. Lamberson that the Committee can add an agenda item to true up the by-laws with the ordinance changes if needed.

AD Rivera noted that no changes are proposed to the by-laws. Ordinance was only changed to line up with what is already happening.

Mr. Lamberson again commented that he wants to clarify that he wants to add the word "all" only so the Committee can still oversee all funding recommendations.

AD Rivera noted that the Ordinance does list out all funding allocations that the Committee would ever have in their scope of work.

Holly Kelley also noted that the language in the revised ordinance allows flexibility if we receive another source of funding that is related to the Committees' areas of responsibilities. Goal of the ordinance was not to limit responsibility, but to clarify which committee would oversee which funding allocation to improve efficiency on workflows.

AD Rivera noted that it is important to expand CD Committee knowledge of what is going on in other areas of the CDC and funding opportunities that will be coming before you previously. We will be bringing those before you.

Martha Cheever commented that she would like to advocate that the word advocate that the word "all" is left out a the Committee doesn't need to have all matters brought to them, but need to function at a higher policy level. Staff then implements the policy.

Chair Chavez commented that the word "all" was in the ordinance previously. He suggested it might be a good idea to ensure it lines up with HUD required responsibilities.

Betsy Chavez commented that she hears more and more is that we need to hear the voice of our constituency. We've done some of that work and people's voices are being heard in the need for affordable housing. We are really seeing what is happening out in our community.

Linda Garcia commented that her biggest concern that the Committee's influence and impact is shrinking. She doesn't want to be involved in personnel and operational decisions and understands emergencies and trusts CDC staff as professionals to spend the money appropriately. She suggested we reach out to the Latinx community. She also suggested that there are Committee representatives that attend and report on items in each of these Committees and Councils with similar missions. The Committee members have knowledge of communities and information we can share with community. The Committee is a

resource that is not being used. They can help with outreach and advocacy.

Stephanie Hiller noted that the number of agencies dealing with housing and homelessness has grown, which has led to this request by Board. The Committee is the bridge between the Board and the public. We are the ones who have the opportunities to speak for the public and speak to the public.

Chair Chavez would like to review the by-laws to true them up to the roles and mission of the Committee. There was also a previous consultant that did a review and he would like to see it. He also stated that with so many changes in staff he does have concerns about staff's ability to support the work of the Committee which is why it was mentioned.

AD Rivera noted that Anna Lugo just recently completed first phase of her report which will be shared with the Committee. She is working on the next phase and that work will also be brought before the Committee. Capacity has been an issue and there have been several transitions, so it is imperative that there is some stability. That is why we advocated for more FTEs to the Board and they heard us.

Chair Chavez wants to ensure that we are addressing communities where there is a need. The Committee needs to have that education and information to ensure that this Committee makes the best recommendations possible to the Board without getting too much into the weeds.

AD Rivera noted that she has lately been able to work more closely with the Committee so that the needed changes can be made and move the work forward.

Chair Chavez mentioned that Mr. Lamberson brought up the election of officers. Is that in October?

Holly Kelley responded that yes, the election of officers is in either October or November. She will ensure she works with Oscar Chavez and Betzy Chavez to get that on the agenda.

Mr. Lamberson requested that staff send out the by-laws, ordinance and proposed new language for the next meeting. He also recommended including "Basics of Legal Structure, Basics of Organizational Structure" from January 2018 (Willie has copy if we don't). Important to have the information to ensure all on the same page for next month's meeting.

Chair Chavez also noted it might be a good idea to add a new position as historian to Committee. Reading is an important part of the Committee responsibilities to ensure compliance with the ordinances and by-laws. AD Rivera, can we do this?

AD Rivera responded "Absolutely."

No public comments



**Adjournment**

Stephanie Hiller motioned to adjourn, Susan Hollingsworth-Adams seconded. None opposed.  
Adjourned.



City of  
**Santa Rosa**  
CALIFORNIA



**2019 Countywide Assessment of Fair Housing**

# ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING AND HEALTHY AND THRIVING NEIGHBORHOODS

Community Engagement in The  
Latinx Communities for The  
Assessment of Fair Housing

**EQUITY FIRST**  
CONSULTING

Diversity | Equity | Belonging

# SONOMA COUNTY REGIONS AND SUPERVISORIAL DISTRICTS



Figure 1: Map of Sonoma County

Neighborhoods Visited

**IN LAK'ECH**

*Tú eres mi otro yo.*

You are my other me.

Si te hago daño a ti,

If I do harm to you,

Me hago daño a mi mismo.

I do harm to myself.

Si te amo y respeto,

If I love and respect you,

Me amo y respeto yo.

I love and respect myself.



## DIVERSITY

Representation [and celebration] of a range of groups[/perspectives] in a given setting.



## EQUITY

Removing the predictability of failure or success based on social background or factors.



## BELONGING

Being fully human means more than having access. Belonging entails being respected at a basic level that includes the right to both co-create and make demands on society.

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## ACKNOWLEDGEMENTS

### Comunidad (Community)

**Al centro de este esfuerzo de participación comunitaria está usted, la comunidad.** Su confianza, participación y disposición para compartir las historias de su vida fueron clave para nuestro trabajo, y estamos realmente agradecidos por el regalo de su tiempo que hizo a nuestro proyecto un éxito. A través de nuestro respeto por usted, esperamos poder darle una fracción de lo que nos ha dado. Esperamos que este informe eleve sus voces, respete su dignidad y establezca el inicio de una relación significativa con la Comisión de Desarrollo Comunitario del Condado de Sonoma.<sup>1</sup>

### Community Engagement Team

Community-based consultants and neighborhood-based interviewers alike were critical to the success of this effort. Their work and dedication to telling the stories of the community in a way that preserved their agency and dignity was exemplary. This effort was a true demonstration of what it means to be culturally responsive, a key step in shifting community engagement practices, and a model of true public service.

### Community Partners

This effort would not have been possible without the support and endorsement of community partners. We are grateful for the ways in which they made their staff, many who work on the front lines, available to the project to share the experiences of the communities they serve, and tell their stories in a dignified manner. The love and passion these staff hold for these communities is truly inspiring.

### Sonoma County Community Development Commission Team

Equity First thanks the CDC team for the high caliber of public service exhibited during this project. Beginning with former Executive Director Margaret Van Vliet, who sought out Equity First to ensure that CDC move towards equity in housing and establish a real relationship between CDC and the community it serves. This project has been resourced and supported by current and former leaders of the CDC, including former Executive Director Geoffrey Ross, and current Interim Executive Director Barbie Robinson . Their collective strong leadership was critical to the success of this effort.

The commitment of Felicity Gasser and Janelle Wetzstein to ensure a true and genuine culturally responsive community engagement process that valued and honored the members of the communities targeted was truly exemplary of what it means to be a public servant. Their willingness and flexibility to meet the community where they are and the needs of this project has set the standard for true collaboration and engagement.

With gratitude,  
Ana Lugo, *Founder*  
Equity First Consulting

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<sup>1</sup> **At the core of this community engagement effort is community.** Your trust, participation, and willingness to share your life stories are key to our work, and we are truly grateful for the gift of your time in making our project successful. Through our respect for you, we hope we were able to give you a fraction of what you have given us. We hope that this report uplifts your voices, respects your dignity, and establishes the start of a meaningful relationship with the Sonoma County Community Development Commission.

## BACKGROUND

This project started under the Obama 2015 rule, Affirmatively Furthering Fair Housing (AFFH) (part of the Fair Housing Act, Title VIII of the Civil Rights Act of 1968). The Fair Housing Act states its purpose as follows:

The Fair Housing Act not only prohibits discrimination but, in conjunction with other statutes, directs HUD's program participants to take significant actions to overcome historic patterns of segregation, achieve truly balanced and integrated living patterns, promote fair housing choice, and foster inclusive communities that are free from discrimination (Affirmatively Furthering Fair Housing, 2015).

The Fair Housing Act provides protections from discrimination to population groups classified as protected classes. Members of the Latinx communities are designated as a protected class. The Assessment of Fair Housing seeks to understand what the impediments to fair housing are for this population, established the need for meaningful community engagement, and the impetus for this project.

During this project, The 2015 AFFH rule was suspended by current federal administration (Affirmatively Furthering Fair Housing, 2015) however, under California's 2018 Assembly Bill 686 (AB-686, titled *Housing Discrimination: Affirmatively Further Fair Housing*) California required local jurisdictions to “[i]nclude a diligent effort by the local government to achieve public participation of all economic segments of the community in the development of the housing element, and the program shall describe this effort” (CA AB-686 Housing Discrimination: Affirmatively Further Fair Fousing, 2018).

California's commitment to full participation has been further detailed in the memorandum from Zachary Olmstead, Deputy Director of the Division of Housing Policy Development, on titled *AB 686 Summary of Requirements in Housing Element Law (Olmstead Memo, 2020)*.

Development of an AFH must include meaningful community participation, consultation, and coordination that is integrated with the broader stakeholder outreach and community participation process for the overall housing element. This engagement should be consistent with the requirements set forth in the AFFH Rule.<sup>14</sup> Key stakeholders and collaborators to consider: 1. Public Housing Authorities (PHAs) in California are subject to the general mandate of AB 686 (as well as the federal AFFH rule) and should collaborate with their housing element jurisdiction(s) as part of their AFFH obligation. [text omitted] 2. Housing and community development providers and advocacy groups. 3. Community members that are



members of protected classes and advocacy organizations that represent protected classes (Olmstead, 2020, p5).

## COMMUNITY PARTICIPATION PROCESS

The cultural wealth within the Latinx and indigenous communities in Sonoma County is vast. Effectively reaching these communities required developing engagement strategies with careful consideration for their beliefs, values, and practices, which may or may not diverge from those of the dominant culture. This report focuses on the culturally responsive engagement efforts focused on the Latinx community for the AFFH Assessment (The Project). The Project team focused its engagement efforts on establishing a foundation for continued development of long term relationships by directing resources neighborhood level engagement, small group engagement, and stakeholders engagement.

Equity First utilized Equity-Centered Design (ECD), and aspects of Community Based Participatory Research (CBPR) modeled in *Finding Positive Health in “Fortalezas” and “Comunidad”: A Case Study of Latinos/X in Sonoma Valley* (Dominguez et al., 2020). Through ECD the project sought to prevent the replication of systems of oppression and disenfranchisement in collecting the voices of the Latinx community in Sonoma County. Equity First led the project team in the design of engagement strategies and tactics and instruments that aimed to remove barriers for the Latinx population to provide feedback and input on the AFFH Assessment. Through the centering of belonging and cultural responsiveness<sup>2</sup> in the design process, the project team was able to create safe[r] spaces for these populations to freely provide feedback.

### Summary of Findings

The neighborhood level engagement - door to door interviews, yielded a total of one hundred and thirty (130) surveys with one hundred and twenty-three (123) interviewees self-identified as renters, one hundred fourteen (114) self-identified as Latinx, and one hundred and three (103) identified as Spanish speakers. One hundred and two (102) households indicated having at least one person under the age of eighteen. A total of nineteen (19) organizations participated in stakeholder conversations throughout the five regions (and supervisorial districts) of Sonoma County. One Focus group conducted, and was centered around young people who self-identified as people of color, Latinx (n=6).

- **Fear of Displacement:** 60% (n=129) of interviewees indicated being afraid that they would not be able to continue living in the neighborhoods due to cost of housing.
- **High Rents:** the total average rent increases, cumulatively, experienced in the past five years was of \$443 (n=53).

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<sup>2</sup> This was only possible through the intentional process of bringing together a team of community engagement partners with diverse background, skills, and lived experience.

- **Discrimination: many (53) interviewees experienced discrimination.** The top spaces where interviewees experienced discrimination ( $n=53$ ) were stores, schools, and doctor's office.
- **Majority essential workers:** one hundred and nine (109) interviewees identified that someone within their household worked in essential services.
- **Government Disconnected from these Communities:** one hundred and twelve (112) interviewees indicated that they have not had local representatives visit their neighborhood.
- **Strong Support Systems:** 69% of interviewees indicated that they have a strong social supporting system., including family and friends with whom they held regular interactions.
- **Communities Lack a Sense of Belonging for Youth:** Youth interviewees indicated that they do not feel a sense of belonging in Sonoma County.

## INTRODUCTION

The Latinx and indigenous (including Native American communities)<sup>3</sup> communities have deep roots in Sonoma County that span far beyond the arrival of white settlers, whom through dispossession, violence, and corruption gained access to the land of Sonoma County. The fabrics of these communities are woven into that of the larger community, and as Sonoma County evolves into a majority-minority community,<sup>4</sup> intentional and respectful engagement with these communities can ensure healthy and thriving neighborhoods throughout the entire county. The Sonoma County Community Development Commission set on a journey to begin to establish a relationship with the Latinx communities<sup>5</sup> in Sonoma County.

Community Engagement directly connects institutions to the communities they serve to ensure that systems change and policymaking is responsible and reflective of the needs, desires, and ideas of the community members themselves. As communities evolve within Sonoma County, and people of color and other traditionally minority groups become the majority, it is key to the development of culturally-relevant services to understand what types of barriers, discrimination and challenges to reach services they face

A recent survey in Sonoma County found that a quarter of residents had experienced discrimination in the rental market. Hispanic families had been denied rental opportunities by landlords stating that they would not rent to single parents with children (Moore et al., 2019, p.26).

To move beyond understanding the challenges to access services, we utilize our equity lens to see to the underlying level: experiencing discrimination is a symptom of segregation.

Thus, understanding segregation<sup>6</sup> in the region allows for systems to transform and not replicate systems of oppression. The set of briefs on segregation released by the Othering and Belonging Institute at University of California Berkeley in 2018 provides a detailed account of the high levels of segregation in the San Francisco Bay Area's 9 counties, including Sonoma County. "The Bay Area is visibly segregated at the regional, county, metropolitan, municipal, and neighborhood levels." (Menendian, et al., 2018). Further, whites are the most segregated group within the region; minorities are much more likely to be integrated with each other than they are to be integrated with white

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<sup>3</sup> Though the scope of this particular project did not include targeted engagement toward the Native American population, in describing the history of this community, they must be properly acknowledged and their experiences honored.

<sup>4</sup> Residents within a jurisdiction who do not identify as non-Hispanic Whites are the majority.

<sup>5</sup> The neighborhoods targeted did not account for the indigenous population density. Recommendations around indigenous communities will be set forth in the Future Directives section.

<sup>6</sup> Segregation is not just a separation of particular groups of people from each other, but from opportunity and resources. As such, segregation is the root cause of racial inequality in the United States (Menendian, et al., 2018).

communities. The history of redlining and white flight in the larger region also occurred in Sonoma County.

African Americans who managed to purchase property in Sonoma County had to contend with the real possibility of racially motivated violence and vandalism. In the 1950s, the Santa Rosa weekend home of San Franciscan NAACP leader Jack Beavers was burned. Black and white neighbors alike agreed that the fire was likely a deliberate act “done to the family because of discrimination” (Moore et al., 2019, p. 27).

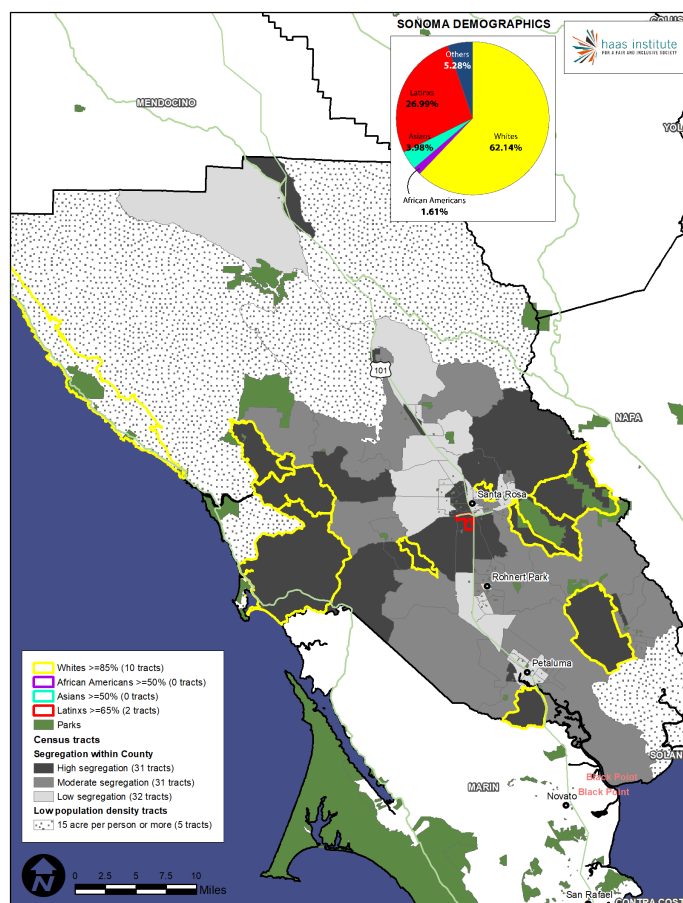


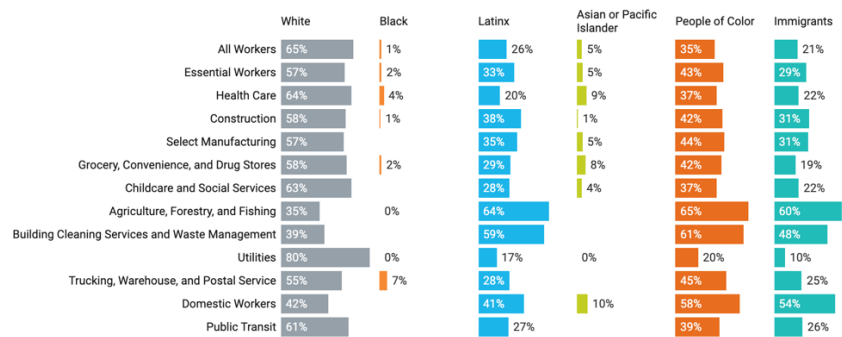
Figure 2: Segregation in Sonoma County

Understanding segregation and its impact on communities at the neighborhood level is key for Sonoma County: between “2000 and 2014 while the total population grown in the county was 7%, the people of color population grew by 46%[,] and [y]et, these populations continue to face lower wages and higher housing burdens” (The San Francisco Foundation, 2017). However, growth in the population did not result in growth in income or increase in political power.

Median asking rent for a two-bedroom unit was \$2,300 in Sonoma County and \$2,250 in Contra Costa County. Renters would need to earn more than \$40 per hour to be able to afford these rents. Low-income Latinx households increased by over 93,000 (60% between 2000 and 2015)—more than any other low-income racial group during this period (UC Berkeley Urban Displacement Project and the California Housing Partnership, n.d.).

Recent data and analysis contained in the 2020 Bay Area Equity Atlas regarding the disproportionate impact on the Latinx community, further evidences the connection between segregation and poor housing outcomes and higher numbers of COVID-19 cases: systemic inequities and racism continue to perpetuate barriers, burden and adversely impact this population. The analysis revealed that “Latinx workers are disproportionately concentrated in frontline occupations where workers are more likely to live in or near poverty, lack US citizenship and health insurance, and have limited English proficiency.” (Henderson, 2020). Similarly, this Project found that most households had members who worked in essential, frontline jobs. (Table 2).

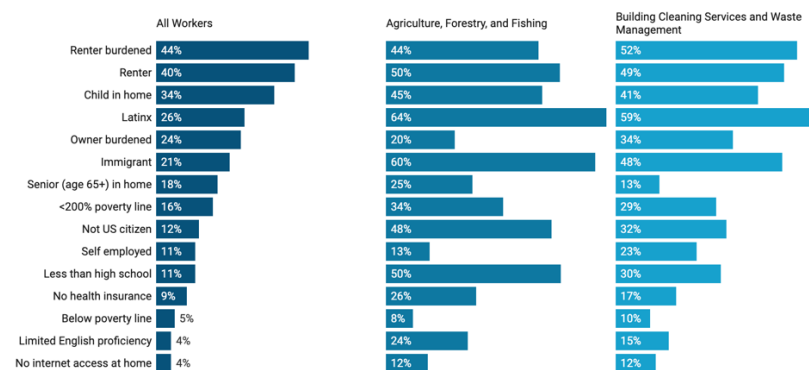
**Sonoma County workers of color and immigrants are disproportionately on the frontline**



Source: Center for Economic and Policy Research Analysis of American Community Survey, 2014-2018 5-Year Estimates. Note: Data for some groups is excluded because of small sample size.

Figure 3: Latinx on the Frontlines

**Workers in Sonoma County industries that are largely Latinx are socially and economically vulnerable**



Source: Center for Economic and Policy Research Analysis of American Community Survey, 2014-2018 5-Year Estimates

Figure 4: Latinx Rendered Vulnerable by Systemic Inequities

## COMMUNITY PARTICIPATION PROCESS

Equity First established best practices centered in values of Diversity, Equity and Belonging for the neighborhood level interviews, stakeholder conversations and focus groups for the Project team.

### Methods of Engagement

Equity First designed engagement strategies with objective to remove barriers for the Latinx population to provide feedback and input on the AFFH Assessment. In conducting neighborhood level engagement, meeting people where they are, the project sought to prevent replicating systems of oppression and disenfranchisement in collecting the voices of the Latinx community in Sonoma County through Equity-Centered Design (ECD), and aspects of Community Based Participatory Research (CBPR) through participation of community leaders throughout the planning process. By centering belonging and cultural responsiveness in the design process, the project team was able to create safe[r] spaces for these populations to more freely provide feedback.

### Measurements of Well-Being

To define the descriptors and measurements for healthy and thriving communities, the design team utilized the Human Development Index, “a measure made up of what most people believe are the very basic ingredients of human well-being: health, education, and income” (Measure Of America, n.d.), “and Social Determinants of Health, which are “designed to identify ways to create social and physical environments that promote good health for all” (Office of Disease Prevention and Health Promotion, 2020)<sup>7</sup> With these measurements as well as cultural characteristics for creating healthy and thriving communities, the project team chose neighborhoods, designed the survey instruments, and other data collection tools to be utilized by community-based consultants.

### Neighborhood Level Engagement

Going to where people are in their homes. Neighborhood based input and data collection was critical to the success of this project given the ways in which these people have been disenfranchised and traumatized by governmental policies, institutions, and systems. The project team deliberately and successfully recruited a diverse pool of neighborhood interviewers, and then provided, a thorough training on the goals of the project, the themes of Diversity, Equity and Belonging, and of best practices for data gathering. By recognizing the cultural wealth in these communities, Equity First needed only to adequately equip neighborhood interviewers with the tools necessary to provide a safe interaction for the members of the neighborhoods visited, and to ensure successful data gathering. This type of engagement also served the purpose of humanizing data. Key Highlights from this neighborhood-level engagement include:

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<sup>7</sup> For a detailed account of characteristics, see Appendix A.

- Households willing to participate in the survey were provided a gift card.<sup>8</sup> Through this, the Project Team sought to acknowledge and honor that the time of community members is valuable and reflect the values of equity-centered design through action.
- The neighborhood interviewers conducted a conversation-style interview and filled out the survey instrument during the conversation.
- Neighborhood interviewers provided feedback on the neighborhoods targeted within the Census Tracts chosen for this project.
- Providing a sense of respect and safety for community members in answering questions was number one priority. While they were encouraged to answer all questions, they were also given full agency to skip any and all questions that they were uncomfortable answering.

### **Stakeholder Conversations and Focus Group**

The Stakeholder conversations engaged with existing partners who serve populations most impacted by systemic inequities in Sonoma County. This form of engagement sought to engage stakeholders who interact directly with these populations including but limited to direct services providers including case managers, nurses, teachers, outreach workers, etc. The stakeholder conversations were held throughout the 5 regions of the county: East, North, West, South and Central, which may also be delineated by supervisorial district.

Focus groups were conducted with specific populations whose experiences and perspectives would be harder to reach through the other methods of engagement. These groups were given a Visa gift card<sup>9</sup> as a demonstration of respect and understanding. Focus groups were held in spaces deemed appropriate and safe[r] for these populations and at times most convenient for them. By Equity First, being invited into their space, fully explaining the project to participants, explaining the impetus for their participation, and giving them full agency to engage at whatever level they felt comfortable doing so and well as being able to stop their participation at any time, we were able to hold a container, as was held during the door-to-door interactions to ensure that participants felt safe, and not obligated to respond in order to mitigate the opportunity for re-traumatization.

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<sup>8</sup> Gift cards were \$10 each to Starbucks, Walmart and Target. Project team sought advice from members of the communities targeted on the types of stores that would be most convenient and beneficial for them. Project team understood that this was the level of micro-level intentionality needed to ensure of this effort.

<sup>9</sup> Visa gift cards were \$50.

## ANALYSIS AND DISCUSSION

Equity First's community engagement process targeting the Latinx community resulted in meaningful engagement of residents and stakeholders representing local organizations. Through the training administered to neighborhood interviewers and conversation facilitators, Equity First ensured uniformity in data collection. The data collected through neighborhood based engagement, stakeholder conversations, and focus group discussions did not provide a big enough sample size to allow for a statistically significant study. However, the focus of this effort was to create a ground level viewpoint of the experiences and disparities faced by the respondents of the neighborhood-level surveys; provide a thorough account of the prominent themes, and a profile of the average household interviewed.

### Neighborhood Level Data

Neighborhoods targeted were those with high Latinx population density and within those neighborhoods, there was a particular focus placed on subsections of neighborhoods with possible higher levels of impediments to fair housing in order to get a more in depth understanding of the challenges that they face, and this led to a focus on people who identified as renters and many who lived in apartment complexes. Total of 130 surveys were completed with 129 surveys connected to census tracts. The range responses per census tract was between 17- 26, which for the purpose of this study met the overarching goal of 20 per census tract. The following is a breakdown of the census tracts targeted, identified by names used in the Portrait of Sonoma, in an effort to create uniformity of census tract identification across studies.

Census Tracts - Neighborhoods	HD Score	Total Occupied Homes	Total % Renters	% Latinx Pop
Roseland Creek	99	1436	49%	62%
Roseland	98	1218	72%	65%
Sheppard	97	1482	45%	63%
Fettters Springs (Agua Caliente West)	96	1831	53%	69%
Rohnert Park - A Section	92	2408	76%	43%
Central Healdsburg	82	1667	56%	47%

Table 1 : Neighborhoods Targeted

The average number of years interviewees stated that they have lived in Sonoma County: 9 years ( $n=129$ ). The average number of years interviewees stated that they have lived in the corresponding neighborhood: 9 years ( $n=129$ ). Sixty percent, (60%,  $n=129$ ) of interviewees responded that they were afraid that



they would not be able to continue living in their neighborhood because of the cost of housing.

### **Household Composition**

The typical composition of households interviewed were renters (93%  $n=124$ ), living in apartment complexes (75%,  $n=127$ ), with an average of 4.6 individuals per household. 78% ( $n=130$ ) of households indicated that they had children under 18 with an average of 2.6 under children ( $n=102$ ) per household. The average household had 2.4 bedrooms ( $n=127$ ). 83% ( $n=130$ ) of households identified Spanish as their primary language. 77% ( $n=128$ ) of households identified a male as head of household.

One hundred and two (102) interviewees having children ages 0-18 in the household. Responses identified three children per household as the largest group at 35% or 45 responses. Twenty (20) interviewees identified having elderly (over 65) in the household. Eight (8) households were considered multigenerational households, with both children (0-18) and elderly (65+) residing in the same household. All of these multigenerational households identified as Hispanic/Latina/o/x, their primary language was Spanish, and four (4) of these households had a person with disabilities. Seven (7) interviewees identified having a person with a disability in the household. Seven (7) interviewees identified receiving support to pay rent. Eighteen (18) interviewees identified having a person(s) staying at their home in a bedroom temporarily, 13 identified as charging rent for the bedroom(s). Five (5) interviewees identified having a person(s) staying in a different type of space (living room [sofa], garage) within their home and three (3) identified as charging rent for the space.

### **Identity Descriptors**

Ninety one percent (91%) or 114 interviewees self-identified as Hispanic/Latina/o/x ( $n=125$ ) with 24% or 27 of these interviewees who self-identified as Mexican. 82.3% or 107 individuals identified Spanish as their primary language, 16%, 21 identified their English as their primary language. Amongst Latinx households 90% of 103 identified Spanish as the primary language while 9% or 10 identified English as their primary language.

## Housing Features

Access to safe drinking water and basic sanitation is a basic human right ("United Nations", 2014), and are a part of having access to the opportunity to lead safe and healthy lives. After the 2017 Sonoma Complex fires, the high levels of lack of rental insurance became a topic of concern. As shown in Chart 1 most households still continue to lack access to rental insurance. Interviewees identified the types of access they have to these features.

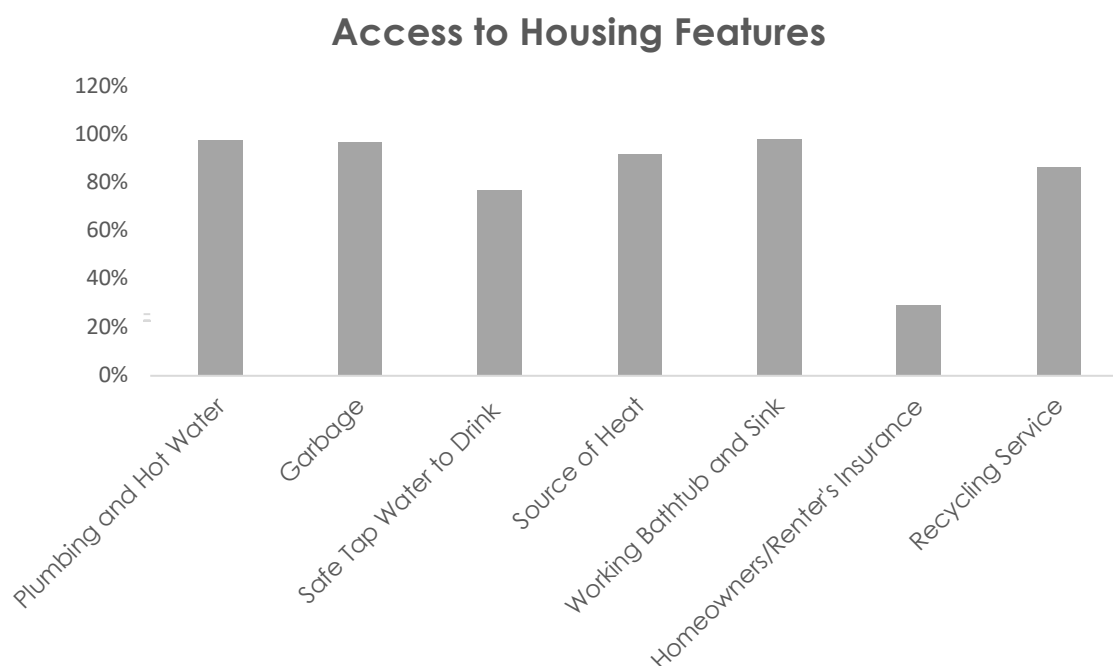


Chart 1: Access to Housing Features

## Rent Increases

Interviewees were asked if they had experienced rent increases in the last 5 years, and by how much each time. 86 Interviewees identified a rent increase in the last 5 years, 53 interviewees specified amount increase(s), and the average amount increase experienced was \$443. An additional 33 interviewees identified the number of times they had experienced a rent increase, but not the amount. These Interviewees experienced rent increases in the last five years an average of 3 times.

## Discrimination

Interviewees were asked to identify situations where they felt they were treated unfairly based on race, color, religion, national origin, sex, disability or familial status; 53 interviewees answered. The top situations they identified were at stores (23), at school (13), and at the doctor (12). Other: 2 indicated that they felt discriminated against at the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) store and 3 indicated it was work-related. Twenty percent (20%,  $n=130$ ) of interviewees indicated that they had been discriminated against when trying to access housing. 92% ( $n=24$ ) indicated that

it was for a rental, and the top three reasons (n=23) interviewees gave for being discriminated against were Race/Ethnicity, National Origin, and Familial Status. Twelve percent (12%, n=120) had at some point been turned down for a home loan.<sup>10</sup> Eight percent (8%, n=129) indicate that they had been the victim of predatory lending.<sup>11</sup>

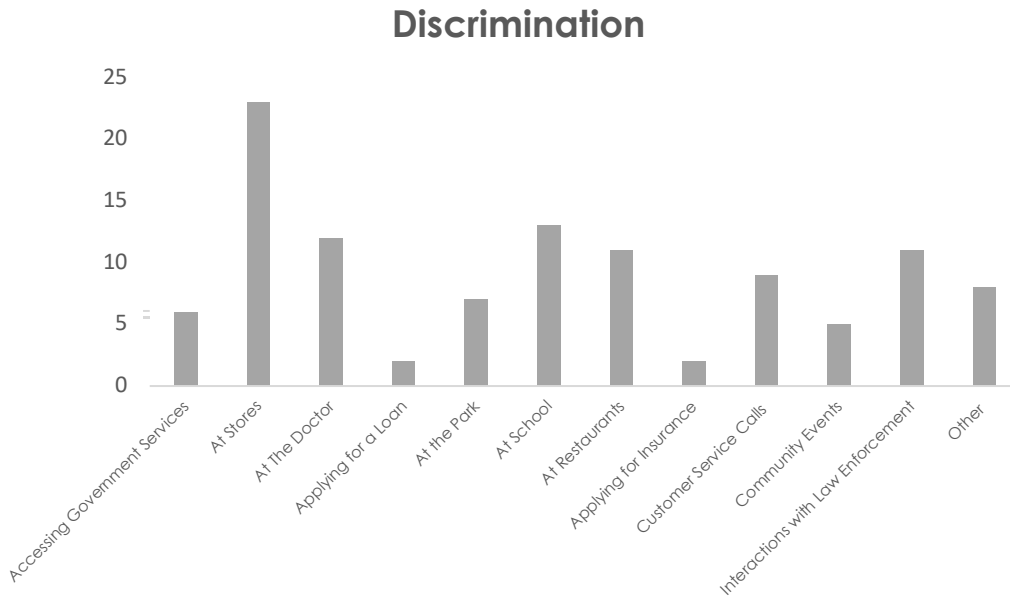


Chart 2: Spaces Discrimination was Experienced

**Transportation**

Thirty six percent (36%, n=129) interviewees indicated that someone within their household utilizes public transportation, and 91% (n=128) own a car.

Thirty-nine (39) Interviewees identified **Inadequate public transportation (stop too far/frequency/unprotected from elements/expensive)** as

main barrier to public transportation being able to meet their needs. 10 interviewees indicated that they felt burdened by the cost of gasoline.

**Households Utilizing Public Transportation**

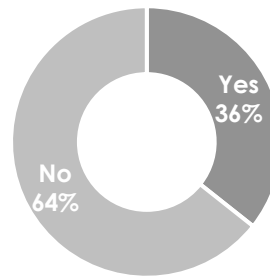


Chart 3: Public Transportation

**Income**

Sixteen percent (16%, n= 123) of the interviewees indicated that someone within their household holds more than one job. Thirty eight (38) interviewees indicated

<sup>10</sup> Survey did not ask interviewees if they had ever attempted to apply for a home loan in the first place.

<sup>11</sup> During data analysis, Equity First did additional data quality scrub, and acknowledges that the definition of predatory lending provided to neighborhood interviewers was not easily communicated to subjects. Such lack of clarity on the word and may have prevented accurate data gathering on this question.

that someone within their household received government assistance. The types of industries interviewees indicated members of their households are employed in are majority in essential services.

Type of Employment	Responses
Carpenter/Construction/Landscape	30
Farmer/Vineyard/Field	24
Cook/Bartender/Chef/Restaurant	17
Housecleaning/Janitorial	13
Driver/Transportation	11
Cashier/Sales	9
Caregiver/Child Care	7
Healthcare/Social work	6
Business Owner/Office	4
Education	3
Retired/Unemployed	3
Government	2
Multiple Sectors	2
Mechanic	1

Table 2: Types of Employment

### Health

Thirty-eight (38) interviewees identified receiving different types of government assistance with WIC (24) and Food Stamps/SNAP (14) as the most commonly identified. 51 interviewees identified the following health related concerns with cost of insurance being top of mind for 43%.

Health Concerns	Number of Responses
Cost/insurance	22
Transportation/Disability/Healthier eating/Housing/Environment/other	8
Dental health/insurance	6
Diabetes	5
Obesity	5
Mental Health/Stress	4
High Blood Pressure	1

Table 3: Health Concerns

### Dental Care

The Behavioral Health Risk Survey conducted in 2012 found that Seventy-seven percent (77%) of survey respondents with incomes at 200% of FPL or higher reported having had their teeth cleaned by a dentist or dental hygienist within the past year, as compared with 47% of those with incomes below that level. Among respondents living below FPL, only 35% report cleaning within the past year; 16% report not having had their teeth cleaned in the past 5 years; and 11% report never having had them cleaned (County of Sonoma: Prioritized Community Health Needs, 2012).

One hundred and Twelve interviewees provided an answer to dental health coverage, ninety-eight (98) interviewees (88%) identified one or more individuals in the household with dental coverage.

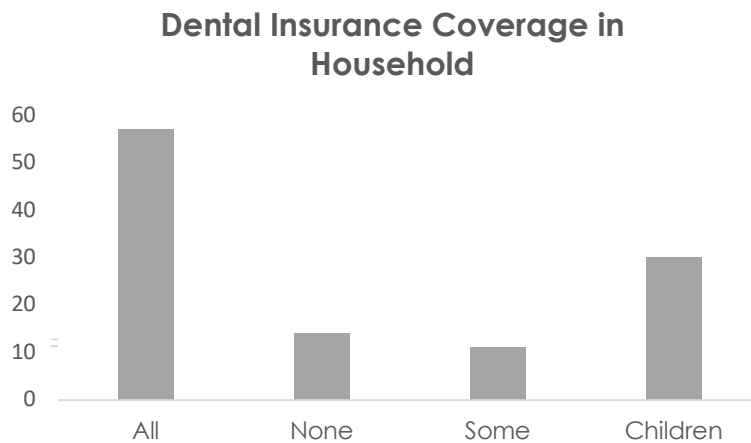


Chart 4: Dental Insurance

### Park Access

Eighty two percent (82%,  $n = 125$ ) of interviewees indicate that individuals within their household go to the park. Interviewees who indicated that individuals within their household do not go to the park (gave the following reasons ( $n=17$ ).

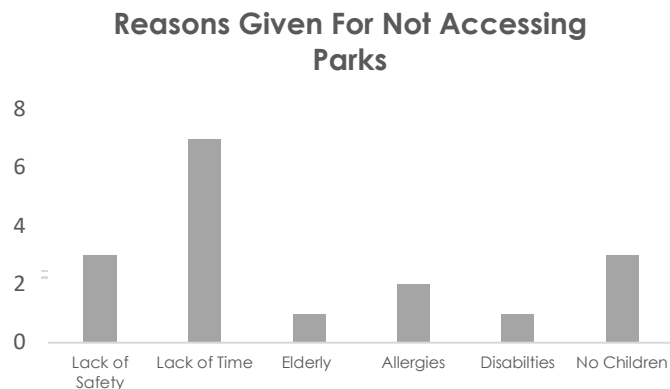


Chart 5: Barriers to Park Access

**Food**

One hundred and twenty-seven (127) interviewees identified the establishments, *Table 4* where their households buy food. Fifty five percent (55%, *n=123*) indicated that they do not buy organic food with 73% (*n=64*) noting **Cost** as their number one reason and 8% indicated that they sometimes buy organic food but did not indicate a reason. Other reasons were: 14% - lack of familiarity/not understanding the difference, 5% noted dislike or sensed no need for organic food.

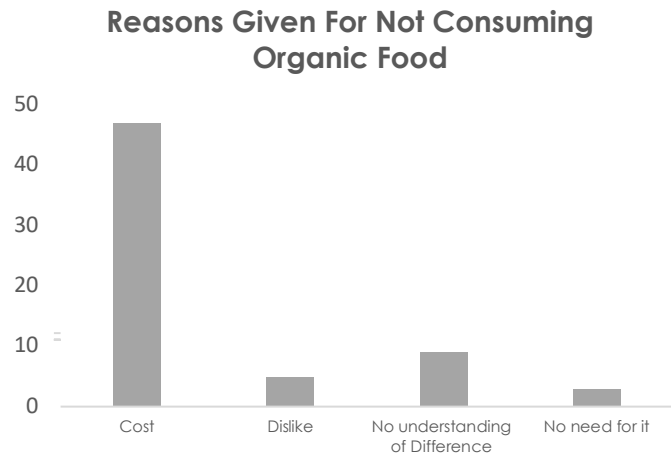


Chart 6: Barriers to Access of Organic Food

Types of Stores Food is Purchased	Response Count	Response Percentage
Grocery store (e.g. FoodMaxx, Safeway, Walmart, Grocery Outlet)	105	83%
Farmers market or organic stores (i.e. Oliver's or Trader Joe's)	28	22%
Street vendors	15	12%
Convenience Store	29	23%
Local small store	19	15%
Fast Food	19	15%
Culturally based stores (e.g. Ortega's Market, Carniceria Mendoza, Asian Food Market)	74	58%
Prime Nutrition (WIC store)	11	9%
Other (Costco, 99 Cent Store, Dependent on Income, Food Bank)	7	6%

Table 4: Stores Most Commonly Accessed

### Access to Mental Health

Fifty two percent (52%, n=127) interviewees indicated that they knew where to access mental health services, of those 87% (n=62) indicated that they were comfortable accessing these services.

Knowledge of Where to Access Mental Health Services

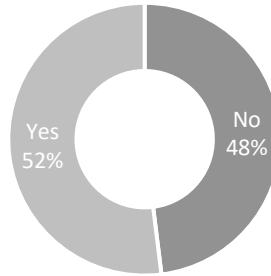


Chart 7: Knowledge of Mental Health Access

### Community and Safety

One hundred and two (102) Interviewees identified the community features on Chart 8, they wish to have better access to in their neighborhoods. Features most commonly identified in the “Other” category were lighting and safety.

### Desired Community Features

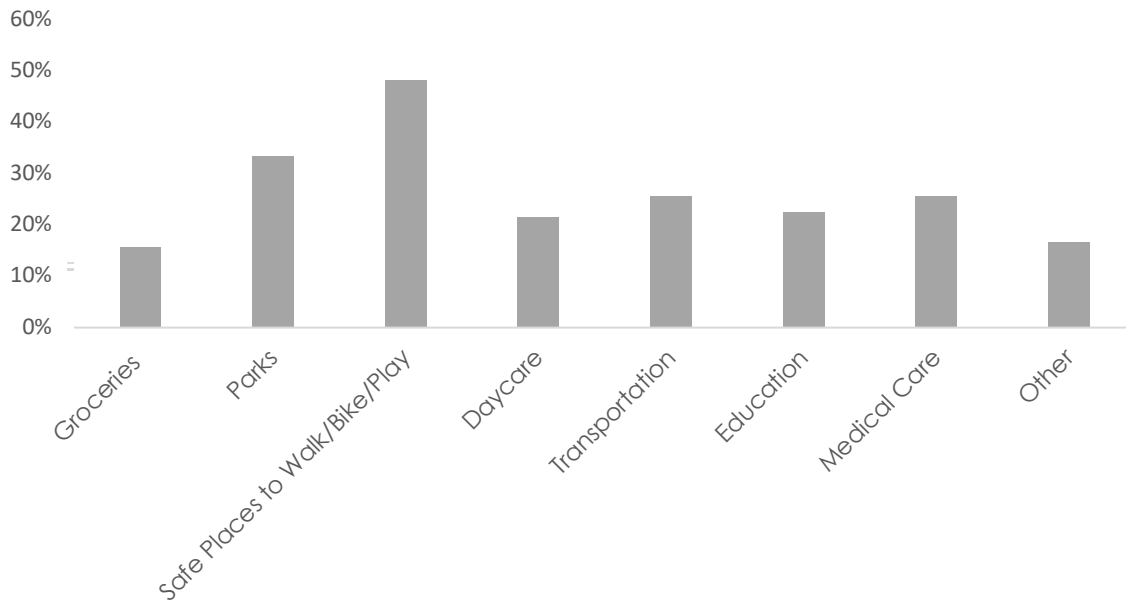


Chart 8: Desired Community Features

Sixty Seven percent (67%, n=98) of interviewees stated that children within their household play outside. Households where a reason was given as to why children do not have access to playing outside indicated 71% lack of safety, 24% neighbors or managers complain about children (n=21).

### Reasons Children Do Not Play Outside

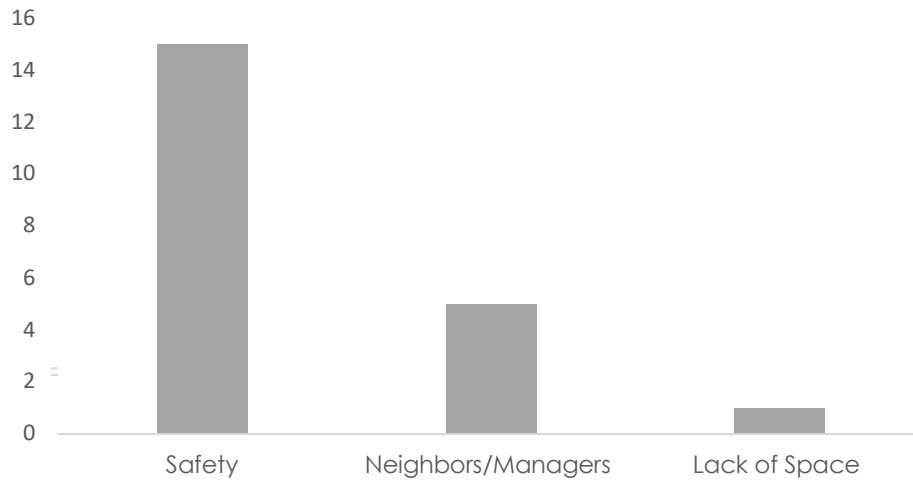


Chart 9: Barriers to Access of Outdoor Play

Fifty-six (56) interviewees identified that the following community events take place in their area and 52% (n=106) indicated that they attend community events in their area. 83% (n=121) indicated that they are not a part of a community group. Church, Bayer Farm, Community Building Initiative Roseland, neighborhood watch and schools were named as groups where interviewees held membership.

### Types of Community Events in Neighborhoods

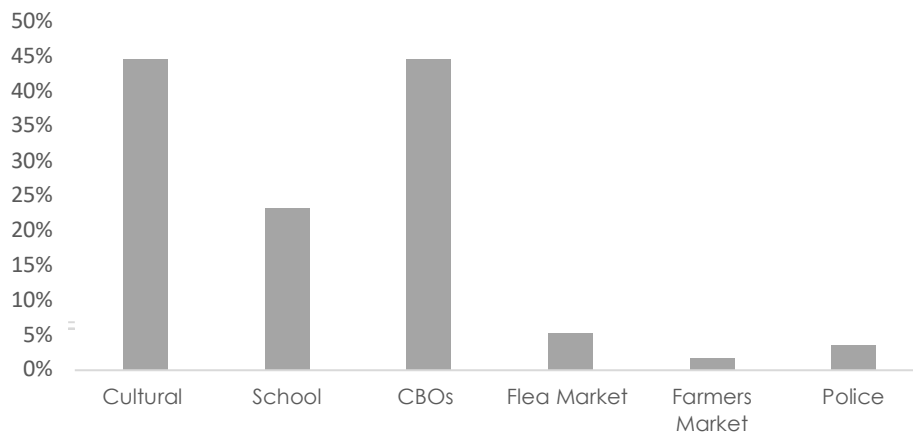


Chart 10: Access to Community Events



Ninety percent (90%,  $n=124$ ) of the interviewees identified that they had not had a visit from their elected representatives and 95% ( $n=124$ ) indicated that they do not call elected representatives or government offices when there is a need in their neighborhood.

**Exeprience of Elected Representatives Visiting Neighborhoods**

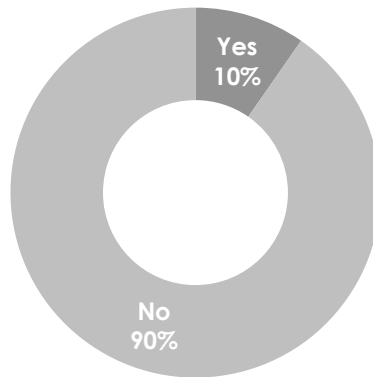


Chart 11: Access to Elected Representatives

**Call Elected Representatives/Government Agencies when there is a need in Neighborhood**

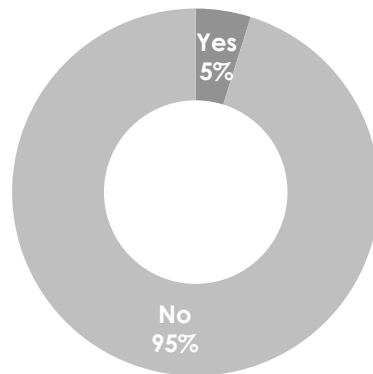


Chart 12: Seeking Support from Agencies

### Support System

Seventy eight percent (78%,  $n=130$ ) interviewees indicated that they have family members or close friends that live in Sonoma County. 73% ( $n=128$ ) indicated that family members or close friends live close by and/or that they see them regularly. 69% ( $n=128$ ) indicated that they have a strong social support system.

Strong Social Support System

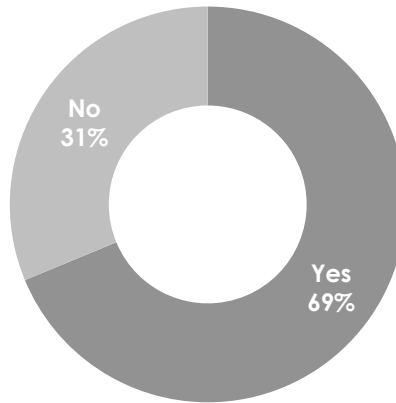


Chart 13: Social Support System

## Stakeholders

Stakeholders conversations included employees and members (all together “stakeholders”) of organizations from all regions of the county. Stakeholders identified the following as populations they serve *Latina/o/x, Non-Latinx POC, Women, Youth, People Experiencing Poverty, Spanish-Speakers, Countywide, Region Specific, Undocumented.*

Participating Community Partners	
Reach for Home	Latino Service Providers
Corazon Healdsburg	Humanidad
Alliance Medical Center	Santa Rosa Health Centers
Petaluma Adult School - McDowell Family Resource Center	La Plaza - Nuestra Cultura Cura
Petaluma Health Center	CAP Sonoma - Community Engagement Dept.
St. Vincent De Paul - Youth Commission	River to Coast
Hanna Institute	Graton Day Labor Center
La Luz Center	Community Building Initiative - Roseland
F.I.S.H.	VOICES Sonoma
Sonoma Valley Community Health Center	

Table 5: Participating Community Partners

**Experience of Displacement or Threat of:** Stakeholders identified that following as top of mind concerns for the communities they serve.

Experience of Displacement or Threat of	
High Costs of Rent	Burdensome Process for Section 8
Overcrowding	Rules are not culturally responsive
High Deposit and Rental Application Fees	Unjust Affordable Housing Wage Caps
Burdensome Rental Process	Lack of Resources
Substandard Housing	Seniors More Vulnerable
Fear	Lack of Protections
Property Managers	Lack of Rent Control

Table 6: Displacement

**Disparities in Access to Employment:** Stakeholders identified that following as top of mind concerns for the communities they serve.

Disparities in Access to Employment	
Lack of Documentation Leads to Lack of Opportunity/Discrimination/Abuse	Lack of Affordable Transportation
Low Wages	Income Level to Qualify For Services Too Low. Vicious Cycle
Lack of Opportunities for Employment Due to Individual Identifiers	Systems Are Difficult To Navigate
Lack of Affordable Child Care	

Table 7: Disparities

**Effects of Exposure to Poverty:** Stakeholders identified that following as top of mind concerns for the communities they serve.

Effects of Exposure to Poverty	
Fractured Family Dynamics	Bad Housing Conditions
Health/Mental Health/Trauma/Stigma	Increased Bullying at Schools
Service Provision Perpetuates Poverty	

Table 8: Exposure to Poverty

**Impediments to Safe Living:** Stakeholders identified that following as top of mind concerns for the communities they serve.

Impediments to living in a safe environment	
Lack of Engagement by Agencies Who Work on Safety	Lack of Housing that is Affordable, including affordable housing.
Lack of Government Engagement and Investment	Lack of livable wages
Lack of investment in infrastructure and Upkeep of neighborhoods	Lack of representative leadership
Lack of accessible health/mental health services/nutritious food options (food deserts exist in these neighborhoods)	Lack of accessible and clean community spaces
Lack of Access to Proper Transportation	Lack of equity in systems
Lack of investment in making buildings/Housing ADA	Lack of Access to Economic Stability

Table 9: Barriers to Access of Safety

## **Focus Group**

The focus group conducted centered around young people with identifiers as people of color and Latinx, some of whom had experiences in systems of care. Young people identified the following concerns:

### **Housing**

Youth identified housing as a top concern. The lack of affordability, along with barriers to eligibility such as credit history, lack of co-signer, and having to live with strangers who may not be culturally sensitive. Youth identified that access to purchasing a home does not feel feasible for their generation.

### **Transportation**

Youth identified that transportation is not accessible for youth due to its limited schedules, routes, and high fees.

### **Community**

Youth identified that there is a lack of physical spaces where youth feel welcomed. Youth indicated that this community is not friendly to young people and that there is a lack of youth friendly activities that do not include alcohol.

### **Health**

Youth indicated that they face systemic barriers to accessing health care as it is not easily understood what the eligibility requirements are, and the cost can be high. Youth identified a concern that there are not enough therapists of color and they do not know how to get support in finding one of the few that do exist and/or insurance may be a barrier to accessing one.

### **Resources**

Youth identified resources available as inadequate for their needs or there being barriers to accessing the ones they need. A barrier commonly identified where the hours of operations for resources, "not being opened late enough".

Youth identified that they do not feel a sense of belonging in Sonoma County. Barriers to feeling safe and welcomed as people of color, members of the LGBTQIIA+ community, or having parents who are immigrants.

## RECOMMENDATIONS



**Housing:** High cost of rent, lack upkeep of buildings, mold and mistreatment by managers are all impediments to fair housing and contributing factors to adverse health effects and barriers to thriving community and well-being.

- **Recommendations:** Provide and ensure housing protections for tenants, build a safety net, and provide adequate well-coordinated and culturally responsive support.

**Safety:** Lack of lighting, gang activity, speeding cars, theft, lack of safety on streets and parks, and homelessness are some of the aspects identified that create a lack of safety in these communities. This coupled with the lack of connection to government agencies, lack of trust and lack of sense of belonging, keeps communities from being able to be healthy and thrive.

- **Recommendations:** Support communities to build neighborhood level engagement and connection with law enforcement agencies, train and encourage law enforcement to build culturally responsive anti-racist community policing protocol, and prioritize services to individuals experiencing homelessness who reside in these neighborhoods so that they too are able to live in healthy and thriving communities.

**Community Infrastructure:** Lack of proper street lighting, lack of road maintenance, lack of community spaces, lack of green spaces, lack of clean

environment and lack of functional transportation are all contributors to the lack of sense of belonging, health and connection.

- **Recommendations:** Direct appropriate departments to work in partnership with appropriate jurisdictions and agencies to prioritize infrastructure projects in these communities, and to collaborate with the community to bring their vision to life.

**Health:** Cost of insurance, increased in cost of food, lack of organic produce, pollution, and fear are all contributors to increased rates of disease, trauma and death.

- **Recommendations:** Fund health in these communities, advocate for state and federal funds for health-related projects, provide safety net for uninsured and underinsured individuals and increase mental health support.

**Cost of Living:** Lack of increase in wages, higher cost of living, inability to qualify for basic government supports lead to community forced to leave county and a loss of cultural wealth.

- **Recommendations:** Create program that supports the increase of minimum wages to reflect the cost of living and provide support to small businesses to be able to afford paying dignified wages to their employees.

### Neighborhood Barriers and Opportunities

63 interviewees provided final thoughts or comments. The following topics were identified as concerns and recommendations for government action:

#### Top of Mind Concerns

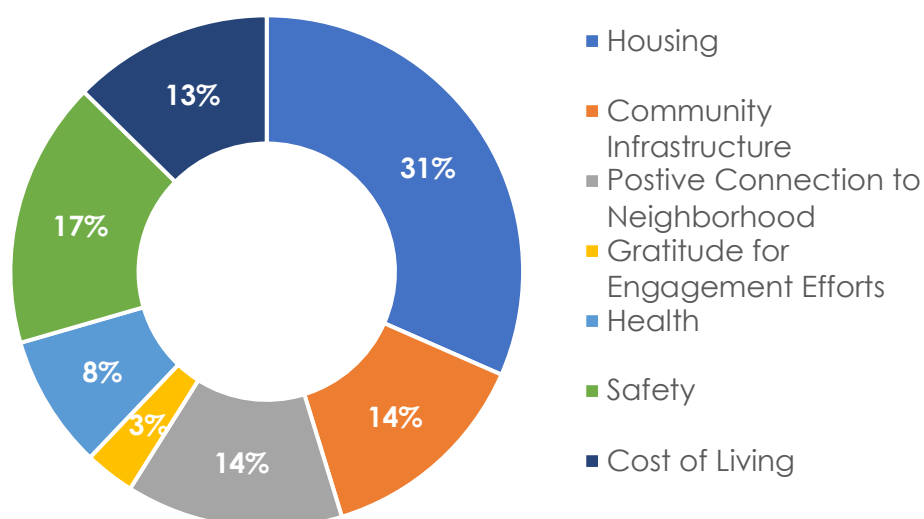


Chart 14: Top of Mind Concerns

## Youth Focus Group

Youth identified the following as top areas of concern.

Opportunities to Address Concerns of Youth	
Housing	Lack of affordability, along with barriers to eligibility such as credit history, lack of co-signer, and having to live with strangers who may not be culturally sensitive. Youth identified that access to purchasing a home does not appear feasible for their generation.
Transportation	Not accessible to youth due to its limited schedules, routes, and high fees.
Community	Lack of physical spaces where youth feel welcomed. Lack of youth friendly activities that do not include alcohol.
Health	Systemic barriers to accessing health care as it is not easily understood what the eligibility requirements are, and the cost can be high. Youth identified a concern that there are not enough therapists of color and they do not know how to get support in finding one of the few that do exist and/or insurance may be a barrier to accessing one.
Resources	Resources available are inadequate and do not meet their needs, and there are barriers to accessing the ones they need. A barrier commonly identified where the hours of operations for resources, "not being opened late enough".
Belonging	Youth indicated that this community is not friendly to young people.

*Table 10: Barriers Identified by Youth*



## Stakeholders Conversations

Stakeholders identified the following as top of mind requests for increased resources and recommendations for the communities they serve.

Opportunities to Address Needed Resources	
Fair housing was transferred to Marin County and needs to come back to the community.	Increase housing opportunities, more funding for housing.
Legal aid is needed in North County.	Provide education for community leaders to truly understand what families are facing.
Support for members of the community to navigate systems.	Build culturally responsive spaces.
2-1-1 has been transferred to San Diego and it is not user friendly.	Growers should offer protective gear so that workers are not getting infected on the job.
Higher involvement of community in policymaking.	Create a safety net for undocumented immigrants.
More Childcare. Income guidelines are too low.	High wages that reflect the cost of living.
Pass the rent control policy.	Continue to remove language barriers.
put a sanctuary ordinance in place that can be enforceable so that people do not have to be afraid that the police will collaborate with ICE.	Increase engagement to help families understand their rights. Create communities where families feel safe to exist.

Table 11: Stakeholders Identified Needed Resources

## Belonging

Interviewees identified a positive connection to their neighborhoods, sense of enjoyment to live in their communities. Interviewees issued gratitude to neighborhood interviewers, positive reaction to engagement efforts, survey, and makeup of neighborhood interviewers. Stakeholders identified family bond and unity as a mechanism for resilience and an asset of these communities. Further, they identified the ability of these communities to come together as an important asset for Sonoma County as a whole. Youth indicated that while there were not enough youth friendly spaces, Santa Rosa was the city in Sonoma County where they felt most welcomed, and organizations like VOICES helped them to feel like they belonged.

## RESEARCHER POSITIONALITY

Bias is inherent in most actions, and it is no different in engagement, analysis, or any other function generated by consulting firms. It is a priority for the Principal<sup>12</sup> of Equity First to ensure clients and readers of its products understand the socially constructed lens through which she has come to form her identity descriptors. Principal identifies as a cisgender woman, an immigrant, nonindigenous, nonblack, from the dominant culture of Mexico and most specifically from Mexico City, who does not have a physical or developmental disability, who has the privilege of telecommuting during the pandemic, and who is able to comfortably meet her economic needs. These identity descriptors create limitations for Principal in fully understanding, accounting for, and remaining aware of the impacts of this study for the populations targeted.

## FUTURE DIRECTIONS

1. Future community engagement must continue to evolve culturally responsive strategies in order to capture voices from subpopulations such as Indigenous communities, LGBTQIIA+, People with Functional Needs, etc.
2. Substandard housing is directly linked to health consequences. Future research must include a focus on these types of living conditions that housing features alone was not able to capture.

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<sup>12</sup> Founder and CEO of Equity First Consulting.

## CONCLUSION

This report explored impediments to fair housing and disparities impacting the communities surveyed, identified on Table 1, in census tracts/or neighborhoods with HD score of 82 or more (most in the high nineties). It was evidenced that many interviewees are experiencing threat of displacement and fear that the cost of housing and living will take them away from their communities. The larger implications for Sonoma County as a whole include a permanent loss of important cultural fabric which weaves the communities together and makes Sonoma County the attractive and desirable destination that it is.

The key to healthy and thriving communities is honoring the people who make up these communities and their values and love for their neighborhoods. Latinx and indigenous communities have strong cultural identities across Sonoma County, and recognizing and embracing those communities is critical to better understand how inequities adversely affect these communities and the types of resources required to achieve fair housing and healthy communities throughout Sonoma County.

Members of these communities indicated that they love their neighborhoods. That love is evidenced by their stories about the great need for housing protections, infrastructure investments, wage increases, and culturally responsive safety mechanisms. These communities have long been deprived resources; therefore, a reallocation of resources and protections will be necessary.

Housing is the first step toward giving individuals and their families full agency over their lives. In order to develop anti-racist policies in Sonoma County, it is key to understand segregation and its impacts on communities at the neighborhood level, and the ways in which fragmented institutions and systems continue to perpetuate such. Housing insecurity and burdens are not isolated nor are they mutually exclusive from educational outcomes, from health outcomes, or from discriminatory attitudes. They are all interconnected and must be treated as such. It will be to the benefit of these communities for leaders throughout the community to listen deeply and act based on the true understanding of the needs of and in true collaboration with community, equity must be at the center of any efforts looking to dismantle racism, especially in housing.

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## APPENDIX A

### Portrait of Sonoma - Human Development Index

#### CAPABILITIES

Physical safety  
 Political participation  
 Sustainable environment  
 Respect of others  
 Digital access  
 Family and community  
 Voice and autonomy  
 Equality before the law  
 Religious Freedom  
 Self-Expression

#### DIMENSIONS

A long and healthy life  
 Access to knowledge  
 A decent standard of living

#### Social Determinants of Health

Education  
 Neighborhood and Built Environment  
 Health and Health Care  
 Economic Stability  
 Social and Community Context

#### OTHER CATEGORIES

Access to nature  
 Type of housing  
 Public bathrooms  
 Community events  
 Access to art  
 Improved sidewalks  
 Daycare  
 Safety Accessing Services

## EQUITY FIRST

### ***Diversity, Equity and Belonging***

*The active celebration and utilization of our unique and collective identities, experiences, knowledge, and wisdom to transform and evolve communities, institutions and systems to meet our needs and provide resources in order to live full, healthy, thriving lives, be full participants of, and make demands upon the communities we live in.*

Equity First Consulting is a Diversity, Equity and Belonging Strategy Firm co-designed by women of color and their allies. This firm is led by its Founder, Ana Lugo, and is supported by a wide network of cross sector leaders who embrace our diversity and elevate our power. Equity First works to support private and public organizations to develop internal cultures that foster and celebrate equity and meaningfully engage their leaders at all levels to create a community culture that reflects these values and practices.

As our society continues to evolve and develop with minorities now making up the New American Majority, our systems and structures must in effect themselves evolve. It will be critical to create spaces that foster the safety and agency of individuals long disenfranchised and ignored. Equity-centered design ensures that

teams and organizations are not replicating systems of oppression and that new structures and leadership are built on a foundation of diversity, equity and belonging.

Equity First also serves as a platform for leaders who are underrepresented in our structures today by connecting and collaborating with individuals and public, private, and non-profit organizations striving toward a more equitable society.

### **Founder**

Ana Lugo comes from a family of strong women who have faced and overcome inequities and injustice. These experiences have created a foundation for a deep understanding of the causes of and ways to address structural inequity, as well as the importance of building community and teams rooted in shared values. She is the Founder of Equity First Consulting, a firm dedicated to creating social change through design and implementation of meaningful community engagement, strategy building, leadership development, and program redesign to achieve equity and belonging.

Ana has had the privilege to lead, develop, and work in strong, diverse teams, and brings this experience to design strategies and practices to deepen the effectiveness of your work. With an educational background in policy and psychology, Ana brings a distinctive lens combining both leadership and institutional development to bring about change that embraces and reflects diverse communities. As a bilingual, bicultural woman of color, Ana utilizes her education, expertise and life experiences to create awareness and change in decision making processes and structures.



**This project is supported by Kaiser Permanente  
Northern California Community Benefits Program.**

# **EQUITY FIRST CONSULTING**

Diversity | Equity | Belonging





**Sonoma County Community Development Commission**  
 Sonoma County Housing Authority  
 1440 Guerneville Road, Santa Rosa, CA 95403-4107

*Members of the  
 Commission*

**Susan Gorin**  
 Chair

**Lynda Hopkins**  
 Vice Chair

**David Rabbitt**  
**Shirlee Zane**  
**James Gore**

## MEMORANDUM

Date: October 21, 2020

To: The Community Development Committee and Cities & Towns Advisory  
 Committee

**Barbie Robinson**  
 MPP, JD, CHC  
 Interim Executive  
 Director

From: Martha Cheever, Housing Authority Manager

Subject: Item #6 – Action Plan Amendment

The Community Development Commission is proposing an amendment to the U.S. Department of Housing and Urban Development (HUD) 2020 Consolidated Plan FY 2020-21 One Year Action Plan.

As you know, the Consolidated Plan and subsequent one year Action Plans are the Board approved planning documents for the use of CDBG, HOME, and ESG funds to meet community priorities in the areas of affordable housing, homelessness and community development.

On September 11, 2020, HUD announced the third and final round of CDBG-CV (CDBG-CV3) funds, of which the Sonoma County Entitlement Jurisdiction was allocated an additional \$1,854,341. In order to release this new allocation of funding, the Commission must prepare and submit another Substantial Amendment to the 2019-2020 One Year Action Plan to take into account the additional funds. Staff is proposing to combine these funds with CDBG-CV1 funds to provide additional funding for the previously approved rental assistance program for tenants and landlords who have been medically or economically impacted by COVID-19 or the Eviction Defense Ordinance. Up to \$370,868 will be used for Administration and Planning and up to \$1,483,472 will be used to provide short-term rental assistance.

Requested Action: Approve Substantial Amendment to the 2019-2020 One Year Action Plan to take into account the additional CDBG-CV3 funds.



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# County of Sonoma

## State of California

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Date: November 10, 2020

Item Number: \_\_\_\_\_

Resolution Number: \_\_\_\_\_

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4/5 Vote Required

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### **Resolution Of The Board Of Supervisors Of The County Of Sonoma, State Of California, and the Board of Commissioners of the Sonoma County Community Development Commission**

**Whereas**, as a condition of receiving housing and community development funds from the U.S. Department of Housing and Urban Development, the Board approved the 2015 Consolidated Plan on May 5, 2015 which describes the community development priorities for the County, and,

**Whereas**, the Board of Commissioners approved the One Year Action Plan for FY 2019-2020 on April 30, 2019 that provides community development funding to be invested in activities that directly support the adopted priorities in the 2015 Consolidated Plan, and

**Whereas**, the Federal Government passed the *Coronavirus Aid, Relief and Economic Security Act* (CARES Act) in response to the COVID-19 pandemic, which was declared a national emergency by President Trump on March 13, 2020 and,

**Whereas**, through the CARES Act, the Department of Housing and Urban Development has made available an additional \$1,854,341 in supplemental Community Development Block Grant (CDBG) funding to the County of Sonoma for grants that may be used to prevent, prepare for, and respond to coronavirus (CDBG-CV grants) and address other community needs;

#### **Now, Therefore, Be It Resolved**

The Board of Supervisors of the County of Sonoma and Board of Commissioners of the Sonoma County Community Development Commission approve the proposed FY 2019-20 Amended One Year Action Plan, including the authority to award \$1,854,341 in CARES Act CDBG grant funding (CDBG-CV) through Notices of Funding Availability or Requests for Proposals to solicit projects and programs that meet the intent and purpose set forth by HUD for this funding and abides by the funding policies of the Community Development Commission.

Resolution #20-

Date:

Page 2

Projects to be funded include:

**Community Development Block Grant (CDBG-CV3):**

Administration and Planning

TOTAL Up to \$370,868

COVID-19 Related Short Term Rental Assistance

TOTAL Up to \$1,483,472

**Supervisors:**

Rabbitt:

Zane:

Gore:

Hopkins:

Gorin:

Ayes:

Noes:

Absent:

Abstain:

**So Ordered.**



**Sonoma County Community Development Commission**  
 Sonoma County Housing Authority  
 1440 Guerneville Road, Santa Rosa, CA 95403-4107

*Members of the  
 Commission*

**Susan Gorin**  
 Chair

**Lynda Hopkins**  
 Vice Chair

**David Rabbitt**  
**Shirlee Zane**  
**James Gore**

## MEMORANDUM

Date: October 21, 2020

To: The Community Development Committee and Cities & Towns Advisory  
 Committee

**Barbie Robinson**  
**MPP, JD, CHC**  
 Interim Executive  
 Director

From: Darrin O’Hara, Affordable Housing Administrative Aide

Subject: No Place Like Home-Round 3 Co-Sponsor Applications

On May 19, 2020, the Sonoma County Community Development Commission (“Commission”) released the No Place Like Home (“NPLH”) Round 3 Request for Qualifications (“RFQ”). The RFQ solicited proposals from qualified Respondents for the planning, design, construction and long-term management of facilities that will provide Permanent Supportive Housing for persons living with serious mental illnesses that are Chronically Homeless, Homeless, or At-Risk of Chronic Homelessness. The Commission would consider applications where the Respondent is the Development Sponsor and jointly applies with the County for the NPLH funds.

As of the RFP deadline, July 27, 2020, the Commission received the following two (2) submissions:

1. MidPen Housing Corporation is requesting \$2,948,072 in NPLH funds for their project, “414 Petaluma Blvd,” a 42-unit project in downtown Petaluma.
2. Burbank Housing Corporation is requesting \$4,303,107 in NPLH funds for their project, “North Quarry Apartments,” a 50-unit project in Southeast Petaluma.

A committee made-up of Commission and Behavioral Health staff, reviewed and ranked the projects. Both project ranked highly and were issued letters of intent to co-sponsor. The Commission will be working with MidPen Housing Corporation and Burbank Housing Corporation in the coming months to clarify relative roles and responsibilities with respect to project approvals and regulatory approvals, financing development, property management and the lead service provider.



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**SONOMA COUNTY**  
**COMMUNITY DEVELOPMENT COMMISSION**

**FY 20210-20212**  
**CDBG, CDBG-DR & HOME**  
**Funding Policies**

*for*

*Affordable Housing*

*Non-Housing Capital Projects*

*and*

*Fair Housing and Housing Justice Program*

Approved by the Cities and Towns Advisory Committee on [~~October 16, 2019~~](#)

Approved by the Community Development Committee on [~~November 20, 2019~~](#)



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## Exhibit 4: Funding Policies



## 1. OVERVIEW

The County of Sonoma, as well as the seven municipalities of Cloverdale, Cotati, Healdsburg, Rohnert Park, Sebastopol, Sonoma, and Windsor, through a Joint Powers Agreement, comprise the Urban County, an entity recognized by the U.S. Department of Housing and Urban Development (HUD) as an entitlement jurisdiction eligible for formula grant funding under the CDBG, HOME, and other HUD programs. The cities of Santa Rosa and Petaluma, although located within the boundaries of Sonoma County, each qualify as separate entitlement jurisdictions and administer their respective HUD funding allocations. The references made in this document to “County” refer to the eight-jurisdiction Urban County.

This document, the FY 2021~~0~~-2022~~4~~ CDBG & HOME for Capital Projects Funding Policies, provides the policy framework to guide the allocation and administration of CDBG and HOME funds, consistent with federal rules, statutes, and regulations, as well as local priorities.

The Sonoma County Community Development Commission (Commission) is the designated local administrative body for each of the federal funding programs.

### 1.1. HUD Funding Programs

#### 1.1.1. Community Development Block Grant Program (CDBG)

The CDBG Program, as created by the federal Housing and Community Development Acts of 1974, as amended, has as its primary objective the development of viable communities through the provision of decent housing, a suitable living environment, and the expansion of economic opportunities, primarily for low- and moderate-income persons. At least 70 percent of Sonoma County’s CDBG funds must be used for activities that benefit low- and moderate-income persons (i.e., persons earning less than 80 percent of the area median income). Any programs or projects allocated CDBG funding must meet one of the following National Objectives:

- Benefit low- and moderate-income persons
- Prevent or eliminate slums and blight
- Meet an urgent need

1.1.1.1. Within the CDBG program, up to 15 percent of funds can be obligated for public service activities. In recent years, the Commission has used its public services set aside for a combination of homeless services and fair housing services. In FY 2021~~0~~-2022~~4~~, given the large investment from the State of California in ending homelessness, and the recognition by the Commission of the need to build a robust Fair Housing and Housing Justice Program, the Commission will use 100% of the CDBG Public Services Set-aside to fund its Fair Housing and Housing Justice Program. Clients served by this program are often prevented from becoming homeless because of legal interventions made. ~~Because~~ Households who are served by the Fair Housing and Housing Justice Programs do not entertouch the HomeOME Sonoma County CoC homeless system of care; ~~therefore,~~ decisions about awarding these fundings decisions are made by the Board of CommissionersSupervisors, with recommendations from the Cities and Towns Advisory

## Exhibit 4: Funding Policies

Committee and Community Development Committee, ~~as Fair Housing and Housing Justice Programs are within their purview.~~

### 1.1.2. HOME Investment Partnership Program (HOME)

The Cranston-Gonzalez National Affordable Housing Act created the HOME Program in 1990. The HOME Program provides funding to local jurisdictions to increase the stock of housing affordable to very low- and low-income households. In 1991, HUD designated Sonoma County a Participating Jurisdiction under the HOME Program.

## 1.2. ~~Consolidated Plan~~

The Consolidated Plan is a five-year plan required by HUD in order for Sonoma County to receive federal housing and community development funds under the CDBG, HOME, and the ESG programs. Federal ESG funds are awarded through a process governed by [HOME the Home](#) Sonoma County [CoC Leadership Council](#), the governance structure for Sonoma County's homeless system of care. The Consolidated Plan, ~~including~~ [includes](#) the goals and specific objectives for the five years ~~and~~, also includes the County's One-Year Action Plans for the use of CDBG, HOME, and local ESG funds during each fiscal year.

The goals and objectives are developed through a citizen participation process conducted concurrently with the first Action Plan's CDBG, HOME, and ESG funding approval process of each Consolidated Plan. The new Consolidated Plan will cover the period from July 1, 2020, to June 30, 2025.

The Consolidated Plan serves the following four functions:

1. A planning document for Sonoma County, which builds on a participatory process.
2. A strategy to be followed in carrying out HUD programs
3. An action plan that provides a basis for assessing performance
4. A required element of the annual application for federal funds under HUD's CDBG, HOME, and ESG programs

The Sonoma County Consolidated Plan encompasses activities undertaken by the Urban County. The cities of Santa Rosa and Petaluma each establish an individual Consolidated Plan for their sole jurisdiction.

## 2. FUNDING GOALS AND OBJECTIVES

These FY 2021~~0~~–2022~~1~~ Funding Policies are based on the goals and objectives that will be identified in the Sonoma County 2020 Consolidated Plan. The Consolidated Plan will organize community priorities for the use of HUD funds by the Urban County. ~~These funding priorities have not yet been set for the FY 2020–2021 Consolidated Plan and will be informed by the completion of a 2019 Countywide Assessment of Fair Housing, to be completed in February 2020, and through a community engagement process to be undertaken in February, March and April 2020.~~

The 2020 Consolidated Plan goals will align with the Strategic Priorities set by the Sonoma County Board of Supervisors on April 4, 2017, particularly “Securing our Safety Net” and

## Exhibit 4: Funding Policies

“Housing for All.” With the assistance of the Community Development Commission, Sonoma County also adopted a Recovery and Resiliency Framework in December 2018 that sets a vision for community recovery following the October 2017 fires. ~~The Community Development Commission assisted in the development of this framework.~~ The Framework includes ~~five~~5 strategy areas, three of which are closely aligned with and build upon the Consolidated Plan goals: Housing, Economy, and Safety Net Services. These multi-year priorities drive the Commission’s work plans and will dovetail with the Consolidated Plan goals and objectives and the selection criteria for funding projects.

Furthermore, the global COVID-19 emergency and shelter-in-place mandates resulted in significant social and economic impacts for Sonoma County residents. Thousands of residents lost jobs or wages due to business closures or medical emergencies connected to the virus. On March 27, 2020, Congress passed the CARES Act. The Act will support preparation for and response to the community impacts of the COVID-19 pandemic and identified additional funding for several programs designed to prepare for, prevent and respond to the coronavirus. This includes new allocations of CDBG and ESG, and added flexibilities to the existing federal programs, which have been incorporated into the Commission’s funding programs through amendments to the 2019-2020 Action Plan. Though it is yet unclear whether there will be additional allocations during the 2021-2022 fiscal year for coronavirus response, variations of the shelter-in-place orders are expected to continue into early 2021. Both the Community Development Committee and Cities & Towns Advisory Committee in public meetings from March through August have expressed a priority to use funds to respond to residents of the Urban County who are most vulnerable economically or medically as a result of COVID-19.

To begin preparing for the 2021-2022 One Year Action Plan~~2021 Consolidated Plan~~, at a public hearing/meeting on March 20, 2019, related to the FY 2020~~2019-202~~ Consolidated Plan and One Year~~0~~ Action Plan, the Cities and Towns Advisory Committee, and the Community Development Committee identified the following draft Selection Criteria for projects. These criteria were further refined during the ~~September 18~~August 16, 2020, 19, Public Hearing at which the Committees gave direction to create a hierarchy for~~incorporate~~ these criteria, into the FY 20210-2024~~2~~ Funding Policies. ~~thus building on the criteria identified through the Spring 2020 5-Year Consolidated Plan community engagement process. These criteria will be vetted and refined through a community engagement process currently underway and continuing through Spring 2020 to become a set of goals and objectives for the 5 Year Consolidated Plan.~~One Year Action Plan.

**1. The following criteria will be used to determine project eligibility:**

- Projects must be located in the Urban County, or clearly demonstrate that they will incur benefit to residents of the Urban County entitlement jurisdiction.
- Preference for projects~~Projects must that demonstrate need with evidence.~~

**1.2. The following Selection Criteria will continue to be used as baseline criteria to rank projects:**

- Preference for projects that create or preserve affordable housing
- Preference for infrastructure or public facilities that support creation or preservation of affordable housing

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- Preference for infrastructure or public facilities that support low or moderate-income populations
- Preference for projects that demonstrate that the proposed project can spend grant funding within the applicable timeliness provisions.
- ~~Preference for projects that demonstrate need with evidence.~~
- For Non-Housing Projects: preference for projects that leverage public funds or in-kind contributions to the greatest extent possible, or projects that meet a particular community need that cannot be met by other funding sources.
  - Examples of non-monetary leveraging includes but is not limited to: in-kind labor or materials, existing site ownership and control, extensions of a current or an existing project that has already received environmental or permit approval.

**2.3. The following Selection Criteria will be given additional consideration in the event of deciding between more than one eligible projects that meet the criteria above; will be added to those currently used to rank projects, based on last year's feedback from the committees:**

- Preference for projects that prevent displacement in high opportunity areas.
- Preference for housing projects with that will create units for very low, extremely low, deep income targeting and special needs populations.
- Preference for projects that demonstrate they will alleviate the impact of climate change on low-income populations. Examples include:
  - ~~infill development~~
  - ~~infrastructure to reduce environmental impacts in LMA communities including:~~
  - ~~new energy efficient housing construction~~
  - ~~Considers mobility needs of low income people, looking at a variety of factors, including:~~
  - ~~Projects that are aligned with local jurisdiction's General Plan Climate Change Element & Equity Element~~
- **For Housing Projects: preference for:**
  - Projects that demonstrate funds will be leveraged against total development costs at least 7:1
  - Projects demonstrating advanced readiness via (a) entitlements; (b) financing commitments; (c) permitting (d) environmental review
  - Project developers who can demonstrate consistent previous success obtaining federal tax credits and/or state funding to develop housing within the last seven years
  - Projects that can demonstrate existing support from other jurisdictions via letters of support, funding commitments, etc.

**3.4. The policies will reflect committees' direction that awards be made with general holistic attention to the following distribution of investments:**

- Balance projects with fast results with-by funding predevelopment for projects that need early money to be successful
- Balance creation of new housing stock with maintaining existing housing stock and keeping people in their homes.

- Make investments in low- and moderate-income areas that have n'ot had investments historically and in high opportunity areas that increase access for low and moderate-income people.

### 3. FUNDING ALLOCATIONS

#### 3.1. CDBG Allocation

CDBG Funds shall be allocated per the table below. Unless otherwise indicated, the percentage of funding in each category is set by the Board of ~~Supervisor~~Commissioners, not by federal regulation.

<i>Community Development Block Grant (CDBG) Allocation Categories</i>	<i>Percentage of Funding</i>	<i>Notes</i>
<b>County-Sponsored Projects, Countywide/Unincorporated Area Projects, City/Town Projects</b>	65%	These funds will be allocated in a competitive process to fund projects located in the Urban County sponsored by CDBG eligible recipients (all municipalities within the Urban County) and subrecipients (all other eligible applicants). Eligible projects are described in Appendix A.
<b>Public Services Projects</b>	15%	Percentage limited by CDBG federal regulations. Given the federal mandate to Affirmatively Further Fair Housing, and the recommendation in the 2011 Analysis of Impediments to Fair Housing to strengthen the capacity of a local fair housing organization to reduce discriminatory activities, the Commission will spend its public services set-aside on a Fair Housing and Housing Justice Program.
<b>Program Administration</b>	20%	Percentage limited by CDBG federal regulations.

#### 3.2. CDBG Program Income and Reprogrammed Funds Allocation

CDBG Program Income and Reprogrammed Funds shall be allocated per the table below. Unless otherwise indicated, the percentage of funding in each category is set by the ~~Board of Supervisors~~Commissioners, not by federal regulation.

<i>Community Development Block Grant (CDBG) Allocation Categories</i>	<i>Percentage of Program Income</i>	<i>Notes</i>
<b>Community Development Commission Housing Rehabilitation Program and Homebuyer Assistance</b>	65%	Program income derived from all CDBG-funded projects will be allocated as follows: Sixty-five percent (65%) will be expended pursuant to priorities set in the annual Action Plan. Use of program income may be subject to an Action Plan Amendment.

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		<p>Reprogrammed funds from all projects other than public services will be expended pursuant to priorities set in the annual Action Plan. Use of reprogrammed funds may be subject to an Action Plan amendment.</p> <p>If the amendment to the Action Plan is substantial, as defined in the Commission's Citizen Participation Plan, it is subject to Board of <del>Supervisor</del><u>Commissioner</u>s approval following a recommendation from the Cities and Towns Advisory Committee and the Community Development Committee.</p>
<b>Public Services</b>	15%	<p>Fifteen percent (15%) of program income derived from all CDBG-funded projects will be used for Public Services, as allowed under CDBG regulations. Use of the 15% set-aside of program income will be expended pursuant to priorities set in the annual Action Plan and may be subject to an Action Plan amendment.</p> <p>Reprogrammed funds derived from Public Services will be expended on Public Services pursuant to priorities set in the annual Action Plan and may be subject to an Action Plan amendment. If the amendment to the Action Plan is substantial, as defined in the Commission's Citizen Participation Plan, it is subject to Board of <del>Supervisor</del><u>Commissioners</u> approval following a recommendation from the Cities and Towns Advisory Committee and the Community Development Committee.</p>
<b>Program Administration</b>	Up to 20%	<p>Percentage limited by CDBG federal regulations. Commission will use up to twenty percent of CDBG program income for program administration and operation of the CDBG program.</p>

**3.3. HOME Allocation**

New annual allocations of HOME funds shall be allocated per the table below. Unless otherwise indicated, the percentage of funding in each category is set by the Board of ~~Supervisor~~Commissioners, not by federal regulation.

<b>HOME Investment Partnership Program Categories</b>	<b>Percentage of Funding</b>	<b>Notes</b>
<b>Tenant-Based Rental Assistance, Development, and Preservation of Rental Housing</b>	Up to 90%	These funds will be allocated in a competitive process to fund projects or programs located in any of the eight Urban County jurisdictions. Eligible projects and programs are described in Appendix A.
<b>Community Housing Development Organizations operational support</b>	Up to 5%	Percentage limited by HOME federal regulations.

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<b>Community Housing Development Organization development or preservation of affordable housing set-aside</b>	At least 15%	Minimum required by HOME federal regulations. Per federal regulation, if this funding category is undersubscribed, any unallocated funds will roll over for allocation in the next fiscal year. Eligible projects are described elsewhere in these policies.
<b>Program Administration</b>	10%	Percentage limited by HOME federal regulations.

### 3.4. HOME Program Income and Reprogrammed Funds Allocation

HOME Program Income and Reprogrammed Funds shall be allocated per the table below.

<b>HOME Program Income and Reprogrammed Fund Categories</b>	<b>Percentage of Program Income</b>	<b>Notes</b>
<b>Executive Director's discretion</b>	90%	At the Executive Director's discretion, funds will be reallocated to the Sonoma County Housing Authority's Tenant-Based Rental Assistance Program, reallocated through an Action Plan Amendment, or rolled forward to the next fiscal year allocation. If the amendment to the Action Plan is substantial, as defined in the Commission's Citizen Participation Plan, it is subject to Board of <del>Supervisor</del> <b>Commissioners</b> approval following a recommendation from the Cities and Towns Advisory Committee and the Community Development Committee.
<b>CHDO Projects</b>	CHDO reprogrammed funds	At the Executive Director's discretion, funds will be reallocated through an Action Plan Amendment or rolled forward to the next fiscal year allocation.  CHDO Set-Aside funds may only be reprogrammed to eligible CHDO projects.  If the amendment to the Action Plan is substantial, as defined in the Commission's Citizen Participation Plan, it is subject to Board of <del>Supervisor</del> <b>Commissioner</b> s approval following a recommendation from the Cities and Towns Advisory Committee and the Community Development Committee.
<b>Program Administration</b>	10%	Percentage limited by HOME federal regulations. Commission will use ten percent of program income for program administration and operation of the HOME program.

## 4. ELIGIBLE APPLICANTS

Individual persons are not eligible to apply for CDBG or HOME funds; however, individuals may apply for assistance from programs assisted with these funds such as housing

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rehabilitation, first-time homebuyer, or tenant-based rental assistance programs. [See 24 CFR 570.207(b)(4)]

#### **4.1. CDBG**

Eligible applicants for CDBG funding are specified by federal regulations. The type of eligible applicant varies by activity type. Generally, eligible applicants are governmental agencies, private non-profit organizations, and Community Based Development Organizations (CBDOs; see 24 CFR 570.204).

#### **4.2. HOME**

Only non-profit and qualifying for-profit organizations and public agencies or local government entities may apply for HOME funding. [See 24 CFR 92.504(c)(3).]

### **5. ELIGIBLE ACTIVITIES**

Eligible activities are described in Appendix A.

### **6. TYPES OF ASSISTANCE**

#### **6.1. Form of Assistance – Rental Housing and Public Facility Projects**

All financial assistance will be in the form of loans secured by real property except for non-housing projects (i.e. public facility projects) sponsored and owned by units of local government where the assistance will be in the form of a grant. Generally, all loans will be three percent (3%) simple interest, with payments deferred for the term of the loans. See Sonoma County Community Development Commission Loan Policies for additional information regarding interest rates and other loan parameters. Upon completion of the project, Commission loans must be fully secured by the post-completion value of the property. The term of the loan will be the longer of thirty (30) years or the longest term of any project financing source.

#### **6.2. Form of Assistance – Ownership Housing Projects**

The interest rate and security requirements for homeownership projects will be the same as those for rental housing developments, as detailed above. The Commission loan to the developer will be for a maximum five-year term and will convert to deferred-payment, subordinate loans to income-eligible buyers at the time of first sale of each unit in the ownership project. The total amount of these loans will be sufficient to recapture the initial amount of Commission loan, plus any interest accrued on the Commission loan as of the date of conversion.

#### **6.3. Funding Agreements, Subrecipient Agreements, Loan Documents and Close of Escrow**

The Commission will execute a Funding Agreement, Subrecipient Agreement, or Developer Agreement with each recipient, subrecipient, or developer receiving financial assistance. For financial assistance provided in the form of loans, the Commission will additionally

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execute a Promissory Note and record a Deed of Trust with a Rider in evidence of the Commission loan commitment and obligations.

#### **6.4. Alternate Loan Terms**

The Commission will consider alternate loan terms that the applicant may request for coordination with other sources of project financing. On a case-by-case basis, the Commission staff may approve requests to assign the Subrecipient or Developer Agreement and/or Commission loan to a partnership or other assignee in compliance with HUD regulations.

### **7. FUNDING CONDITIONS AND PROGRAM REQUIREMENTS**

#### **7.1. Timeliness**

All projects shall proceed in a timely manner, as detailed below. Extensions may be granted for good cause at the discretion of the Executive Director and must be consistent with the funding source regulations.

##### **7.1.1. CDBG**

###### **7.1.1.1. Fair Housing and Housing Justice Program (CDBG)**

Funds for Fair Housing and Housing Justice Programs activities must be expended within the 12 months of the fiscal year for which funding is allocated. Funds that are unexpended after the agreement term will be reprogrammed.

###### **7.1.1.2. Public Facilities and Public Improvements (CDBG)**

The applicant must satisfy all conditions of approval that are set forth in these Funding Policies as a prerequisite to the CDC offering the Subrecipient Agreement for execution within 12 months of the start of the fiscal year associated with the award. Funds for all Public Facilities and Public Improvement projects, including predevelopment costs, hard and soft costs of construction, renovation, or reconstruction (but excluding site acquisition costs, which are governed by 7.1.2 above), must be expended within 18 months of the date on which the Subrecipient Agreement is offered for execution. Funds that are unexpended after this deadline ~~will~~may be reprogrammed.

###### **7.1.1.3. Site Acquisition (CDBG)**

The applicant must satisfy all conditions of approval that are set forth in the Commission Loan Policies as a prerequisite to the CDC offering the Subrecipient or Developer Agreement for execution within 12 months of the start of the fiscal year associated with the award. Site Acquisition funds must be spent within 18 months of the date on which the Subrecipient Agreement is offered for execution. ~~If~~ the site acquisition is not complete within 18 months of the date on which the Subrecipient Agreement is offered for execution, the funds will be reprogrammed.

###### **7.1.1.4. Affordable Housing Development ~~(CDBG)~~**

## **Exhibit 4: Funding Policies**

The applicant must satisfy all conditions of approval that are set forth in the Commission Loan Policies as prerequisite to the CDC offering the Subrecipient or Developer Agreement for execution within 12 months of the start of the fiscal year associated with the award. Disbursement of funds for all affordable housing projects, including predevelopment costs, hard and soft costs of new development, renovation, rehabilitation, and reconstruction projects (but excluding Site Acquisition, which aisre governed by 7.1.1.3 above) must be initiated within 18 months of the date on which the Subrecipient or Developer Agreement is offered for execution. All funds must be disbursed within 24 months after the date on which the Subrecipient or Developer Agreement is offered for execution. Funds that are unexpended after this deadline will be reprogrammed.

#### 7.1.2. HOME

##### 7.1.2.1. Affordable Housing Development (HOME)

The applicant must satisfy all conditions of approval that are set forth in the Commission Loan Policies as prerequisite to the CDC offering the Developer Agreement for execution within 12 months of the start of the fiscal year associated with the award. Disbursement of funds for all affordable housing projects, including predevelopment costs, hard and soft costs of new development, renovation, rehabilitation, and reconstruction projects must be initiated within 24 months of the date on which the Developer Agreement is offered for execution. All funds must be disbursed within 36 months of the date on which the Developer Agreement is offered for execution. Funds that are unexpended after this deadline will be reprogrammed. Affordable housing projects must be completed within four years of the date on which the Developer Agreement is offered for execution. Project completion will be documented by the submission of a temporary or permanent certificates of occupancy for all HOME-funded units. HOME-assisted rental units must be occupied by income-eligible households within 12 months of project completion. A HOME-assisted homebuyer unit must have a ratified sales contract within six months of construction completion.

##### 7.1.2.2. Affordable Housing Development – CHDO set-aside (HOME)

The community housing development organization (CHDO) must satisfy all conditions of approval that are set forth in the Commission Loan Policies as prerequisite to the CDC offering the Subrecipient or Developer Agreement for execution within 12 months of the start of the fiscal year associated with the award. The participating jurisdiction must enter into a legally binding agreement -with the CHDO for a specific project within 24 months of the start of the fiscal year associated with the award. Disbursement of funds for all CHDO projects, including predevelopment costs, hard and soft costs of new development, renovation, rehabilitation, and reconstruction projects must be initiated within 24 months of the date on which the Developer Agreement is offered for execution. All funds must be disbursed within 36 months of the date on which the Developer Agreement is offered for execution. CHDO projects must be completed within four years of the date on which the HOME Funding Agreement is offered for execution. Project completion will be documented by the submission of temporary certificates of occupancy for all HOME-funded units. HOME-assisted rental units must be occupied by income-eligible households within 18 months of project completion. A HOME-assisted homebuyer unit must have a ratified sales contract within nine months of construction completion.

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### 7.1.3. Tenant-Based Rental Assistance (HOME)

Funds for tenant-based rental assistance programs must be committed to specific households within 12 months of, and expended within 36 months of, the start of the fiscal year associated with the award. Funds that are unexpended after this deadline will be reprogrammed.

## 7.2. **Site Control**

In order to demonstrate project readiness and facilitate compliance with the CDBG stress test [24 CFR 570.902(a)] and the HOME timeliness provisions [92.205(e)(2)], capital project applications must demonstrate site control at the time funding is made available to the County by HUD (generally August of the new fiscal year). An executed long-term lease, signed option, or purchase agreement or equivalent, legally enforceable instrument may satisfy this requirement. If site control is not in force at the time when HUD makes the funding available to the County, the funding approval will be rescinded, and the funds will be reprogrammed.

## 7.3. **Environmental Review**

All CDBG- and HOME-funded projects must comply with federal environmental regulations. [24 CFR part 58 National Environmental Policy Act of 1969 (NEPA) and 24 CFR 570.604 (CDBG) and 24 CFR 92.352 (HOME)]

Funding agreements may will not be offered for execution until the required environmental conditions have been met.

### 7.3.1. Certifying Officer, Roles, and Responsibilities

The Commission's Executive Director is designated by the Board of ~~Supervisor~~Commissioners as the Certifying Officer for all National Environmental Policy Act (NEPA) environmental review of CDBG- and HOME-funded projects. Therefore, the Commission will determine and complete, or cause to be completed, the appropriate level of NEPA environmental review, the cost of which shall be the responsibility of the awardee, and may be paid from the awarded grant or loan funds. The awardee must provide all requested information pertinent to completing the environmental review in a timely manner. Failure to do so will result in the reprogramming of the allocated funds to another project.

The applicant must provide the Commission with documentation verifying the satisfaction of any required environmental impact mitigation measures. [See 24 CFR part 58 Subpart B Section 58.13]

### 7.3.2. CEQA Compliance

If applicable, all projects must receive local environmental clearance in accordance with the requirements of the California Environmental Quality Act (CEQA). The applicant will submit the CEQA status from the project's applicable Lead Agency with the grant funding application. The applicant must submit a copy of the CEQA clearance to the Commission prior to a funding commitment being made. [See Cal. Code Regs. Tit. 14. Section 15000 et seq.;]

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#### **7.4. Section 3**

All CDBG and HOME funded projects must comply with the provisions of Section 3 of the Housing and Urban Development Act of 1968, as amended, and with the implementing regulations set forth in 24 CFR Part 135. Any funded entity shall comply with these Section 3 requirements and with the Section 3 Affirmative Action Plan of the Community Development Commission at the time that the funding agreement is executed.

#### **7.5. Federal Labor Standards**

Federal Labor Standards requirements include the Davis-Bacon Act, Copeland “Anti-Kickback Act,” and Contract Work Hours and Safety Standards Act; usually these requirements are referred to as “Davis-Bacon and Related Acts” or DBRA.

CDBG-funded construction or rehabilitation of properties with eight (8) or more total residential units trigger DBRA. [See 24 CFR part 570.603]

Any eligible use of HOME funds – including land acquisition, in which there are twelve (12) or more HOME-assisted units in the same project trigger DBRA. [See 24 CFR part 92.354 & HUD Handbook 1344.1]

#### **7.6. Reasonable Cost of Real Estate Acquisition**

For CDBG- and HOME-funded acquisition projects, the Commission must determine that the cost of the property is reasonable.

A property appraisal carried out by a licensed real estate appraiser, or other evidence of valuation acceptable to the Commission, must be provided to the Commission prior to the Commission offering a funding agreement for execution. Funds for direct site acquisition will not be provided if the purchase price exceeds the documented “reasonable cost” of the real property.

As defined in CFR 200.404, “A cost is reasonable if, in its nature or amount, it does not exceed that which would be incurred by a prudent person under the circumstances prevailing at the time the decision was made to incur the cost.”

Funds for related transaction costs (e.g., title, soils tests, Phase I reports, etc.) may be allowed above the reasonable cost.

#### **7.7. Land Use Approvals**

In order to demonstrate project readiness and facilitate compliance with the CDBG stress test [24 CFR 570.902(a)] and the HOME timeliness provisions [92.205(e)(2)], all CDBG- and HOME-funded projects that require land use approvals must be consistent with the General Plan of the jurisdiction in which they are located. A certification of the project’s consistency with the applicable General Plan, signed by an authorized representative of the jurisdiction, must be submitted with the project application. If a project does not have land use approvals, under certain circumstances, funding can be provided for predevelopment expenses only as long as other threshold criteria are met.

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## 7.8. Compliance with Disabled Access Requirements

All CDBG- and HOME-funded projects must be able to comply with the Architectural Barriers Act of 1968 (PL 90-480) and with 24 CFR Part 8 entitled “Nondiscrimination Based on Handicapped Status in Federally Assisted Programs and HUD Activities.”

24 CFR Part 8 states that no qualified individual with disabilities shall, solely on the basis of disability, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving federal financial assistance from the Department of Housing and Urban Development.

Disabled access must be provided to the greatest extent feasible in non-housing as well as housing facilities. Proposed projects that do not provide access for the disabled may not be considered for funding. In addition, all local and sState disability access guidelines must be followed.

## 7.9. Building Standards

All capital projects (housing and non-housing) must be constructed and maintained in compliance with all applicable federal, sState, and local codes, standards, and ordinances.

For HOME owner-occupied housing rehabilitation, units must meet all applicable local codes, rehabilitation standards, ordinances, and zoning ordinances at the time of project completion. HOME funds may not be used for emergency or small home repairs. [See 24 CFR 92.251]

## 7.10. Relocation and One-for-One Replacement

All CDBG- and HOME-funded projects must follow the relocation and one-for-one replacement procedures outlined in 24 CFR 570.606 (CDBG) and 24 CFR 92.353 (HOME) and ~~in~~ HUD’s Uniform Relocation and Real Property Acquisition Act.

Projects requiring permanent displacement of families, individuals, and/or businesses must also comply with the Sonoma County Residential Anti-Displacement and Relocation Assistance Plan, found on the web, here:

<http://sonomacounty.ca.gov/WorkArea/DownloadAsset.aspx?id=2147576719>

## 7.11. Change in Use

### 7.11.1. Requirements for Urban County Jurisdictions

All properties acquired and/or improved by the County of Sonoma or participating municipalities that comprise the Urban County entitlement jurisdiction memorialized by a Joint Powers Agreement, using CDBG funds must comply with the CDBG regulations at 24 CFR 570.505, which require that the use of the property (including the beneficiaries of such use) cannot be changed from that for which the acquisition or improvement was made unless the jurisdiction in which the project is located provides affected citizens with reasonable notice of, and opportunity to comment on, any proposed change, and either: (1) the new use of such property qualifies as a CDBG-eligible activity; or (2) if the jurisdiction determines, after consultation with affected citizens, that it is appropriate to change the use of the property to a use which does not qualify for CDBG funding, the jurisdiction

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reimburses the Sonoma County CDBG Program in the amount of the then current fair market value of the property, less any portion of the value attributable to expenditures of non-CDBG funds for acquisition of, and improvements to, the property. This requirement shall be in effect until five (5) years after the Urban County is no longer participating in the CDBG Program. For County-owned or controlled properties, compliance with this requirement shall be secured through an annual certification.

#### **7.11.2. Requirements for All Other Entities**

All properties acquired and/or improved by local government entities other than those described in the above paragraph and by non-profit agencies using CDBG funds must comply with the CDBG regulations at 24 CFR 570.503(7)(i) & (ii), which require that the property be used to meet one of the national objectives in 24 CFR 570.208 until five (5) years after expiration of the CDBG Subrecipient Agreement, or for such longer period of time as determined to be appropriate by the Commission; and that if the property is not used to meet one of the national objectives during this time period, the applicant shall pay to the Sonoma County CDBG Program an amount of the then current fair market value of the property, less any portion of the value attributable to expenditures of non-CDBG funds for acquisition of, or improvement to, the property. Compliance with this requirement shall be secured by a deed restriction recorded on title to the acquired or improved property.

#### **7.12. Demonstrating Benefit to Low- and Moderate-Income Persons**

If a project proposes to meet the National Objective of providing a benefit to low- and moderate-income persons, the project must be able to demonstrate that at least 51 percent of households qualify as low- or moderate-income. [See 24 CFR 570.208]

#### **7.13. Affirmatively Furthering Fair Housing**

The Fair Housing Act reflects the federal requirement that HUD “use its grant programs to end discrimination and segregation, to the point where the supply of genuinely open housing increases.” As such, the Affirmatively Furthering Fair Housing rule requires fair housing planning to connect housing and community development policy and investment planning with meaningful actions that achieve material, positive changes in outcomes for protected classes: families with children, people with disabilities, and people of different races, colors and national origins. To be eligible for funding, a project must demonstrate what actions it takes to achieve material, positive changes that advance one of these four goals:

- a. Decrease residential segregation
- b. Eliminate racially and ethnically concentrated areas of poverty
- c. Reduce unequal access to important community assets, including quality schools, job centers, and transit
- d. Narrow gaps that result in disproportionate housing needs for people in protected classes

#### **7.14. Affordability Restrictions for Housing Projects**

The following provisions identify the minimum affordability requirements for new housing development and rehabilitation of existing rental housing developments. Projects that

## **Exhibit 4: Funding Policies**

provide greater and/or longer affordability than the minimums shown will receive a higher priority.

#### 7.14.1. Income Limits

One hundred percent of CDBG and HOME funds will be used to assist units occupied by households with incomes of no more than eighty percent (80%) of the Sonoma County area median income (AMI), adjusted for household size.

At least eighty percent (80%) of the units assisted with HOME funds must initially be occupied by households with incomes of no more than sixty percent (60%) of Sonoma County AMI, adjusted for household size. Subsequently, these units may be occupied by households with incomes of up to eighty percent (80%) of Sonoma County AMI, adjusted for household size.

At least twenty percent (20%) of the units assisted with HOME funds must be occupied by households with incomes of no more than fifty percent (50%) of the Sonoma County AMI, adjusted for household size.

#### 7.14.2. Rent and Purchase Price Limits

Units assisted with CDBG or HOME funds may be sold or rented to income-eligible households at affordable prices and rents, as determined by the Commission in accordance with HUD regulations.

#### 7.14.3. Term of Income and Price Restrictions

Upon completion or acquisition of a housing project, the assisted units must remain affordable for the longer of fifty-five (55) years or the longest affordability term required by other financing in the project. In no case shall the period of affordability be less than the original term of the loan.

### **7.15. Match Requirements**

Per federal regulation, the expenditure of HOME funds will accrue a match obligation equal to twenty five percent (25%) of the amount of the HOME funds expended. The Commission looks to each project receiving HOME funds to generate eligible match funds during the same fiscal year in which the HOME funds are expended. However, the Commission may cite previously reported match funds to satisfy HOME match requirements in subsequent years.

### **7.16. Other Federal Requirements**

In addition to the requirements outlined in this document, all awardees are required to adhere to federal rules, statutes, policies, and regulations associated with the underlying source of federal funds. Primary federal regulatory citations for the two funding sources (CDBG and HOME) are listed below:

1. CDBG: 24 CFR Parts 91 and 570
2. HOME: 24 CFR Parts 91 and 92

## **Exhibit 4: Funding Policies**

### **7.17. HOME Projects Sponsored by a member of the HOME Consortia**

Each year, members of the HOME Consortia may present for consideration by the Committee's projects that a particular member wishes to sponsor. These projects may be brought forward by a member rather than by a private housing developer. Projects are subject to the same threshold and selection criteria as any other project during the Selection Process.

### **7.18. Use of HOME funds for the Commission's Tenant-based Rental Assistance Program**

The Sonoma County Community Development Commission uses HOME funds for Tenant-Based Rental Assistance (TBRA) as a tool to help very low- and extremely low-income households access permanent housing. Commission staff will make recommendations to the Community Development Committee and Cities and Towns Advisory committee regarding the appropriate amount for funding and the ranking compared to other proposed uses of HOME funds. The Commission will not submit an application for TBRA funds through the NOFA process since it is operated internally by the Commission, but any recommendation by staff will be subject to the same threshold and selection criteria as other applicant projects, and a staff report will be prepared for committee consideration.

### **7.19. Use of CDBG funds for the Commission's Single-Family Housing Rehabilitation Program**

The Sonoma County Community Development Commission uses CDBG funds for single-family (up to 4 units) housing rehabilitation as a tool to help low- and very-low-income households retain decent housing that is affordable to them. This program is key to retaining existing housing stock in the County. Commission staff will make recommendations to the Community Development Committee and Cities and Towns Advisory committee regarding the appropriate amount for funding and the ranking compared to other proposed uses of CDBG funds. The Commission will not submit an application through the NOFA process for the Housing Rehabilitation Program since it is operated internally by the Commission, but any recommendation by staff will be subject to the same threshold and selection criteria as other applicant projects, and a staff report will be prepared for committee consideration.

### **7.20. Fair Housing-Related Services and Set-Aside Funding**

Each jurisdiction receiving CDBG funds from HUD must certify that it will affirmatively further fair housing, which means it will conduct an Assessment of Fair Housing or the Analysis of Impediments within the jurisdiction and take meaningful actions to achieve a material positive change that affirmatively furthers fair housing. To remain eligible for CDBG funding, adequate funding for a range of Fair Housing-related services must be provided through a Set-Aside under the Public Services category. Developing a Fair Housing program that meaningfully furthers fair housing is the responsibility of the Commission's advisory body, the Community Development Committee, in its CDBG oversight role.

For FY 2021-2024, the Commission will use 100% of its Public Services Set-aside to fund

## **Exhibit 4: Funding Policies**



a Fair Housing and Housing Justice Program. Subrecipients may be selected through a NOFA process, or staff may recommend maintaining the current subrecipients through an extension and/or expansion of the currently funded one-year subrecipient agreements.

A Fair Housing and Housing Justice Program is ~~an important~~ critical Upstream Investment that can prevent people from becoming homeless. Because people served by this program do not enter the homeless system of care, the funding is not governed by ~~HOME~~ Sonoma County CoC, the governing body for Sonoma County's homeless system of care.

#### 7.20.1. Other Requirements of the Fair Housing and Housing Justice Program

The Commission shall endeavor to join with other entitlement jurisdictions within Sonoma County (Petaluma and Santa Rosa) in the NOFA process to provide consistent and cost-effective service and assistance to citizens of the entire County.

Fair Housing-related services that are part of a robust Fair Housing and Housing Justice Program may include but are not limited to ~~the~~

education about Fair Housing law ~~and~~ investigative testing and auditing ~~and~~ advocating for tenants who may be targets of discrimination ~~and~~ enforcement of Fair Housing law ~~and~~ as well as legal services designed to prevent eviction.

#### 7.20.2. Fair Housing Provider Selection Process (multiple proposals)

In the event that there are multiple proposals for providing fair housing services, a committee made up of staff members of each jurisdiction will recommend appropriate Fair Housing-related services based on the following factors:

- The capacity of the applicant to provide these services.
- The degree to which a capable applicant can leverage additional funding sources to augment the County's funding allocation.
- Coordination with neighboring jurisdictions in the regional provision of fair housing services for optimizing efficiency and customer service
- Cost-effectiveness.

#### 7.20.3. The degree to which the proposed services will implement meaningful actions to achieve a material positive change that affirmatively furthers fair housing, or that addresses recommended actions in the current Analysis of Impediments to Fair Housing Choice. —In the event, no viable proposals are received from community-based non-profit agencies, or no fair housing proposals are awarded funds, Commission staff will provide the required fair housing services utilizing funding from the Public Services Set-aside until which time that a subsequent RFP process can be implemented to secure a qualified contract provider of Fair Housing-related services. Fair Housing Set-aside

The set-aside amount for all Fair Housing-related services shall be 100% of the 15% Public Services Set-aside subject to adequate funding. If the

Community Development Committee recommends a change to the set-aside amount for any fiscal year, the following factors will be considered:

- i. Current funding level for CDBG funding.
- ii. Historical funding levels of selected services.
- iii. Expected cost of activities required to take the recommended actions identified in the analysis of impediments to fair housing choice document.
- iv. Consideration of actual or potential funding from other sources.

## **8. PROJECT SELECTION**

### **8.1. Application Submission Process**

Details regarding the application requirements and timelines are included in the Notice of Funding Availability (NOFA) released in late-October to mid-November of each year for the fiscal year that begins the following July.

**All applicants should attend a Technical Assistance Session for interested applicants to be held on the date listed on the FY 20210-20224 Funding Timeline. Any applicant who cannot attend the scheduled Session should contact the Commission staff as soon as possible.**

Applicants must submit funding applications to the Commission by 5:00 p.m. on the date listed on the FY 20210-20224 Funding Timeline. Project applications must be complete by the deadline date to be considered eligible for funding. Required application contents differ by allocation category; please refer to the NOFA for specific requirements. Applications that do not include all applicable requested documents or complete answers to all applicable questions will be deemed ineligible for funding.

Applications may not be revised and/or submitted after the deadline date. In addition, once a project or program is awarded funding by the Commission it cannot be materially revised prior to contract execution.

### **8.2. Selection Process**

Note: See the FY 20210-20224 Funding Timeline for selection process dates.

#### **8.2.1. Community Development Committee and Cities and Towns Advisory Committee Workshop**

The Sonoma County Community Development Committee (CD Committee) appointed by the Board of ~~Supervisor~~Commissioners and the Cities and Towns Advisory Committee

## **Exhibit 4: Funding Policies**

comprised of one appointed representative from each of the seven incorporated jurisdictions in the Urban County are responsible for reviewing all applications concurrently.

The CD Committee and ~~Technical Advisory Committee~~[Cities & Towns Advisory Committee](#) conduct a concurrent annual public workshop [in February](#) to review staff analysis of applications submitted under the competitive funding categories, take testimony from applicants, and ~~to~~ provide feedback to staff that will be integrated into staff recommendations in the Draft Annual Action Plan.

**The committees will not recommend funding for any project unless a representative from the applicant agency is present at the workshop to answer questions about the proposed project.**

#### 8.2.2. Discretion of Commission Staff

Staff will have some discretion in determining if CDBG or HOME funds are best for a project or if a project would be better suited for non-federal funds. Giving staff discretion will ensure maximum efficiency and effectiveness of limited local, state, and federal funds.

#### 8.2.3. Community Development Committee and ~~Technical Advisory Committee~~[Cities & Towns Advisory Committee](#) Public Hearing

The Draft Annual Action Plan will be presented to both committees at a public hearing during the public comment period for the Action Plan [no later than April 2021](#). The Draft Action Plan will include a list of projects and programs recommended for funding. The committees will concurrently review the draft and finalize the recommendations to be made to the Board of ~~Supervisor~~[Commissioners](#).

**The committees will not recommend funding for any project unless a representative from the applicant agency is present at the hearing to answer questions about the proposed project.**

#### 8.2.4. Tiebreaker Methodology

If the Committees are unable to come to a consensus about which projects should receive funding, a tiebreaker methodology will be used. The tiebreaker methodology will divide funding up based on two factors:

1. The percentage of low and moderate-income persons residing in each member jurisdiction of the Urban County and/or HOME Consortia.
2. Jurisdictions that have two years or more of unallocated CDBG funds will be considered ineligible to receive the proportional allocation of funds because allocating funds to such a jurisdiction may place the Urban County at risk of failing its “timeliness test.” Failing the timeliness test can result in a loss of CDBG funding from the U.S. Department of Housing and Urban Development.

#### 8.2.5. Selection of a “B” list of projects

The committees will include in their ranking process, a set of projects that could be funded if a project to which funds are originally awarded is delayed or cancelled. This will ensure flexibility and timely expenditure of funds.

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### **8.3. Action Plan – One-Year Use of Funds**

The Commission will use the CD Committee and TAC recommendations to prepare the “Action Plan: One Year Use of Funds” to be included in the relevant Sonoma County Consolidated Plan. The Consolidated Plan Summary will be published/disseminated in accordance with HUD regulations and the Sonoma County Citizen Participation Plan. Per the Citizen Participation Plan, a review draft of the Consolidated Plan will be made available to the public for thirty days allowed for written comments to be submitted to the Commission. See the FY 2019-2020 Funding Timeline for the publication dates and the end of the comment period.

### **8.4. Board of Supervisors and Board of Commissioners Final Approval**

The Commission will submit the CD Committee and **C**TAC recommendations, along with all written comments received during the Action Plan comment period and supplementary Commission staff comments, to the Board of Supervisors / Board of Commissioners for approval. The Board is the final decision-maker for determining CDBG and HOME awards. See the FY 2019-2020 Funding Timeline for the Board’s public meeting date.

## **9. THRESHOLD CRITERIA FOR PROJECT EVALUATION**

Applications must meet the following criteria to be eligible for consideration:

1. Is the application complete?
2. Is the proposed project an eligible activity per CDBG or HOME regulations?
3. If applying for CDBG funds, does the proposed project meet a CDBG National Objective?
4. Does the project Affirmatively Further Fair Housing?
5. Is the applicant an eligible applicant/sub-recipient/recipient per CDBG/HOME regulations?
6. Does the applicant demonstrate administrative capacity or request the assistance of the Community Development Commission to effectively deliver the proposed project? If the project requests assistance from the Commission, does the Commission make a determination that it can effectively deliver the required assistance to deliver the project while meeting the timeliness provisions in these policies?
7. *For homelessness-related projects only:* Will the project significantly impact HEARTH system-wide performance measures? Will it shorten the length of homeless episodes, decrease returns to homelessness, or increase placements in permanent housing?
8. *For homelessness-related projects only:* Does the project adhere to the principles of Housing First and participate in Coordinated Entry? If a homeless-serving housing project, does it accept referrals from Coordinated Entry?

9. For CDBG, does the project serve Urban County? For HOME affordable housing development, is the project located in a member jurisdiction of the HOME consortium?

## **10. SELECTION CRITERIA**

The following criteria will be used in the evaluation of eligible applications and will influence the Commission's funding recommendations to the CD Committee. Capital Projects must meet all pre-award conditions, as is also the case for housing awards.

### **10.1. Selection Criteria – All Projects**

#### **10.1.1. Funding Priorities**

10.1.1.1. Projects will be ranked on how well they meet the following priorities:

10.1.1.2. Creation or Preservation of Affordable Housing

10.1.1.3. Infrastructure or Public Facility Supporting creation or preservation of affordable housing

10.1.1.4. Infrastructure or Public Facility supporting low or moderate-income populations

#### **10.1.2. Community Goals**

Projects that meet the following community goals identified by the advisory committees will be ranked highly:

10.1.2.1. Projects that prevent displacement in high opportunity areas

10.1.2.2. Projects that alleviate the impact of climate change on low-income populations such as:

- infill development,
- infrastructure to reduce environmental impacts in LMA communities including bike lanes,
- walkable paths,
- electric vehicle charging infrastructure,
- ride share hailing locations,
- recycling water irrigation infrastructure,
- new energy-efficient housing construction,
- Projects that consider the mobility needs of low-income people, looking at a variety of factors, including:
  - Improved linkages to public transportation
  - Providing car-share options

## **Exhibit 4: Funding Policies**

- Supports people who work non-traditional hours
- Supports people with limited mobility who can't walk far or ride bikes
- Provides neighborhood safety that promotes walking and biking
- Projects that are aligned with local jurisdictions General Plan Climate Change Element & Equity Element

#### 10.1.3. Readiness to Proceed

The applicant demonstrates that the proposed project can spend grant funding within the applicable timeliness provisions (See Section 7.1). Requirements will vary by project type but may include demonstration of site control, completion of environmental review, approval of entitlements, etc.

For Housing Projects, projects demonstrating advanced readiness via (a) entitlements; (b) financing commitments; (c) permitting will rank highly.

#### 10.1.4. Need

Applicant describes the need for the project/program and demonstrates with applicable evidence (e.g., waiting list, census data, documentation of deteriorated conditions, etc.).

#### 10.1.5. Adherence to a competitive procurement process

Applicant adheres to a process wherein conversations outside an adopted competitive procurement process with members of either the Community Development Committee or Technical Advisory advocating for funding of applicant project or program will result in recusal of those members from the decision making process or ineligibility of that applicant project

#### 10.1.6. Financial Feasibility

The project adheres to guidance set out in the Notice of Funding Availability

#### 10.1.7. Outcomes

Applicant demonstrates that the project/program will result in outcomes that are clearly defined, measurable, and directly related to the alleviation of the stated problem

### **10.2. Selection Criteria – Housing Projects**

#### 10.2.1. Leverage

Projects that demonstrate funds will be leveraged against total development costs at least 7:1.

#### 10.2.2. Development Experience

Project developers who can demonstrate previous success obtaining federal tax credits and/or state funding to develop housing within the last seven years

#### 10.2.3. Support

Projects that can demonstrate existing support from other jurisdictions via letters of support, funding commitments, etc.

#### 10.2.4. Income and Population targeting

Housing projects with deep income targeting and special needs populations

### **10.3. Selection Criteria – Non-Housing Projects**

#### 10.3.1. Leverage and Meeting Community Need

Priority will go to projects that leverage public funds to the greatest extent possible or projects that meet a particular community need that cannot be met by other funding sources.

## **11. DEFINITIONS**

**Areas of Opportunity:** places where jobs are relatively plentiful and access to education, healthcare, and other amenities are close at hand.

**Community Development Block Grant Program (CDBG):** Created under the Housing and Community Development Act of 1974, this program provides grant funds to local and state governments to develop viable urban communities by providing decent housing with a suitable living environment and expanding economic opportunities to assist low- and moderate-income residents.

**CDBG Recipient:** a state, city, or urban county that receives a direct allocation of CDBG dollars from the U.S. Department of Housing and Urban Development. Through an urban county cooperation agreement, in the form of a Joint Powers Agreement the County of Sonoma, the Town of Windsor, and the cities of Cloverdale, Healdsburg, Rohnert Park, Sebastopol, and Sonoma together constitute a HUD-designated “Urban County.”

**CDBG Subrecipient:** Government agencies, private, or public non-profit organizations, including institutions of higher education and private for-profit entities, designated by the Urban County to undertake selected CDBG activities.

**Community Housing Development Organization (CHDO):** As defined by HUD, A private nonprofit, community-based organization that has staff with the capacity to develop affordable housing for the community it serves. In order to qualify for designation as a CHDO, the organization must meet certain requirements pertaining to their legal status, organizational structure, and capacity and experience.

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**Continuum of Care (CoC):** The Continuum of Care (CoC) Program is designed to promote communitywide commitment to the goal of ending homelessness; provide funding for efforts by nonprofit providers, and State and local governments.

**Emergency Shelter Grant (ESG) Program:** A federal grant program designed to assist homeless persons through five activity types including Street Outreach, Emergency Shelter, Homeless Prevention, Rapid Re-housing, and HMIS.

**Fair Housing Act:** 1968 act (amended in 1974 and 1988) providing the HUD Secretary with fair housing enforcement and investigation responsibilities. A law that prohibits discrimination in all facets of the homebuying process on the basis of race, color, national origin, religion, sex, familial status, or disability.

**Fair Market Value:** The amount of money that would probably be paid for a property in a sale between a willing seller, who does not have to sell, and a willing buyer, who does not have to buy.

**HOME (HOME Investment Partnerships Program):** Provides formula grants to states and localities that communities use—often in partnership with local nonprofit groups—to fund a wide range of activities that build, buy, and/or rehabilitate affordable housing for rent or homeownership, or to provide direct rental assistance to low-income people.

**HOME Participating Jurisdiction:** localities, metropolitan cities, urban counties or approved consortia that are eligible to receive an allocation of funds under the HOME program. Through an urban county cooperation agreement, in the form of a Joint Powers Agreement the County of Sonoma, the Town of Windsor, and the cities of Cloverdale, Healdsburg, Rohnert Park, Sebastopol, and Sonoma together constitute a participating jurisdiction.

**HOME Subrecipient:** A public agency or nonprofit organization selected by the participating jurisdiction to administer all or a portion of the participating jurisdiction's HOME program.

**HOME Owner, Developer, or Sponsor:** A non-profit or for-profit organization that will own, develop, or sponsor a HOME-assisted project.

**Homeless:** An individual who lacks a fixed, regular, and adequate nighttime residence; as well an individual who has a primary nighttime residence that is a supervised publicly or privately operated shelter designed to provide temporary living accommodations, an institution that provides a temporary residence for individuals intended to be institutionalized; or a public or private place not designed for, or ordinarily used as, a regular sleeping accommodation for human beings.

**Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act:** Amended and reauthorized the earlier McKinney-Vento Homeless Assistance Act with substantial changes in 2009. It consolidated HUD's Continuum of Care grant programs and changed HUD's definition of homelessness and chronic homelessness.

**Homeless Prevention:** Activities or programs designed to prevent the incidence of homelessness, including, but not limited to: (1) short-term subsidies to defray rent and utility arrearages for families that have received eviction or utility termination notices; (2) security

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deposits or first month's rent to permit a homeless family to move into its own apartment; (3) mediation programs for landlord-tenant disputes; (4) legal services programs that enable representation of indigent tenants in eviction proceedings; (5) payments to prevent foreclosure on a home; and (6) other innovative programs and activities designed to prevent the incidence of homelessness.

**Household:** All the people who occupy a housing unit. A household includes the related family members and all the unrelated people, if any, such as lodgers, foster children, wards, or employees who share the housing unit. A person living alone in a housing unit, or a group of unrelated people sharing a housing unit such as partners or roomers, is also counted as a household.

**Housing Stock:** The number of existing housing units based on data compiled by the United States Bureau of the Census and referable to the same point or period in time.

**HUD:** The federal Department of Housing and Urban Development.

**Income Limit:** Determines the eligibility of applicants for HUD's assisted housing programs.

**Lead-Based Paint:** Paint or other surface coatings that contain lead equal to or exceeding 1.0 milligram per square centimeter or 0.5 percent by weight or 5,000 parts per million (ppm) by weight.

**Lease:** A written agreement between an owner and a family for the leasing of a decent, safe, and sanitary dwelling unit to the family.

**Low and Moderate Income Housing Asset Fund (LMIHAF):** Sonoma County's Low-and Moderate-Income Housing Asset Fund (assets from County of Sonoma, Cities of Sonoma and Sebastopol Redevelopment Successor Agencies).

**Market Value:** The most probable price that a property should bring in a competitive and open market, provided that all conditions requisite to a fair sale are present, the buyer and seller are knowledgeable and acting prudently, and the price is not affected by any undue stimulus.

**Microenterprise:** A commercial enterprise that has five or fewer employees, one or more of who owns the enterprise.

**Manufactured Home or Mobile Home:** A structure, transportable in one or more sections, which in the traveling mode is 8 body feet or more in width, or 40 body feet or more in length, or which when erected onsite is 320 or more square feet, and which is built on a permanent chassis and designed to be used as a dwelling with or without a permanent foundation when connected to the required utilities, and includes the plumbing, heating, air conditioning, and electrical systems contained in the structure. This term includes all structures that meet the above requirements except the size requirements and with respect to which the manufacturer voluntarily files a certification pursuant to 24 CFR 3282.13 and complies with the construction and safety standards set forth in this 24 CFR 3280. The term does not include any self-propelled recreational vehicle. Calculations used to determine the number of square feet in a structure will include the total of square feet for each transportable section comprising the completed structure and will be based on the structure's exterior dimensions measured at the largest horizontal projections when erected

## Exhibit 4: Funding Policies

onsite. These dimensions will include all expandable rooms, cabinets, and other projections containing interior space, but do not include bay windows. Nothing in this definition should be interpreted to mean that a manufactured home necessarily meets the requirements of HUD's Minimum Property Standards (HUD Handbook 4900.1) or that it is automatically eligible for financing under 12 U.S.C. 1709(b). **Racially and Ethnically Concentrated Areas of Poverty:** Census tracts where more than half the population is non-white and 40% or more of the population is in poverty OR where the poverty rate is greater than three times the average poverty rate in the area.

**Special Needs Subpopulations:** Include, but are not limited to: 1) elderly households, 2) persons with physical, mental or developmental disabilities, 3) persons with HIV/AIDS and their families, 4) large families, 5) single-headed households, and 6) farm workers.

**Uniform Relocation Act (URA):** The Uniform Act (or "Uniform Relocation Act"), passed by Congress in 1970, is a federal law that establishes minimum standards for federally funded programs and projects that require the acquisition of real property (real estate) or displace persons from their homes, businesses, or farms. The Uniform Act's protections and assistance apply to the acquisition, rehabilitation, or demolition of real property for federal or federally funded projects.

## **12. MORE INFORMATION**

Visit the Commission's website to find more information: <http://www.sonoma-county.org/cdc>

## **APPENDIX A: ELIGIBLE USES OF FUNDS**

### **CDBG Eligible Activities**

<b><i>Consolidated Plan Goal Met</i></b>	<b><i>National Objective Code</i></b>	<b><i>CDBG Eligible Activity</i></b>	<b><i>Eligible Applicants</i></b>
Homelessness	LMC - homeless persons	All uses below as they relate to construction or rehabilitation of facilities to serve homeless households	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Acquisition of Property	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Disposition of property assisted with CDBG	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Rehabilitation	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Solid Waste Disposal Improvements	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Flood Drainage Improvements	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Water/Sewer Improvements	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Street Improvements	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Sidewalks	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Tree Planting	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Homeless Facilities	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Health Facilities	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Shelter for persons with special needs	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Group homes for people with developmental delays	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Battered Spouse Shelters	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Abused or Neglected Children Facilities	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Facilities for AIDS Patients	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Asbestos Removal	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Clearance, Demolition and Remediation	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Cleanup of Contaminated Sites	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Relocation	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Rehabilitation Administration	Governmental Agency or Non-profit

### **Exhibit 4: Funding Policies**

<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Homelessness	LMC - homeless persons	Nonprofit Capacity Building - provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities. (The recipient must determine, prior to the provision of the assistance, that the activity for which it is attempting to build capacity would be eligible for CDBG assistance.	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Assistance to Higher Education Institutions - any eligible activity can be provided to an institution of higher education when the grantee determines that such an institution has demonstrated a capacity to carry out activities that fall under one or more for the basic eligibility categories under the CDBG program	Governmental Agency or Non-profit
Homelessness	LMC - homeless persons	Operation and Repair of Foreclosed Property	Governmental Agency or Non-profit
Affordable Housing: Increase and preserve the housing stock that is affordable, safe, and accessible for low-, very low-, and extremely-low income families and individuals, including those with special needs and those who are homeless or at imminent risk of homelessness.	LMH	New housing construction - only as "are clearly needed to address a lack of affordable housing accessible to existing or planned jobs"	Community Based Development Organization (CBDO)
Affordable Housing	LMH	Homeownership Assistance - can include subsidizing interest rates, financing acquisition, mortgage insurance premiums, closing costs, down payment assistance	Governmental Agency or Non-profit
Affordable Housing	LMH	Housing Rehabilitation - Single family: repair directed toward an accumulation of deferred maintenance, replacement of principal fixtures and components of existing structures, installation of security devices, including smoke detectors and dead bolt locks, and renovation through alterations, additions to, or enhancements of existing structures and improvements, abatement of asbestos hazards (and other contaminants) in buildings and improvements that may be undertaken singly or in combination.	Governmental Agency or Non-profit
Affordable Housing	LMH	Housing Rehabilitation - Multi-family: repair directed toward an accumulation of deferred maintenance, replacement of principal fixtures and components of existing structures, installation of security devices, including smoke detectors and dead bolt locks, and renovation through alterations, additions to, or enhancements of existing structures and improvements, abatement of asbestos hazards (and other contaminants) in buildings and improvements that may be undertaken singly or in combination.	Governmental Agency or Non-profit

## Exhibit 4: Funding Policies

<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Affordable Housing	LMH	Acquisition for Rehabilitation of Housing	Governmental Agency or Non-profit
Affordable Housing	LMH	Housing Rehabilitation Administration - Rehabilitation services, such as rehabilitation counseling, energy auditing, preparation of work specifications, loan processing, inspections, and other services related to assisting owners, tenants, contractors, and other entities, participating or seeking to participate in rehabilitation activities.	Governmental Agency or Non-profit
Affordable Housing	LMH	Lead Based Paint/Hazards Test/Abatement	Governmental Agency or Non-profit
Affordable Housing	LMH	Housing Services - costs in support of activities eligible for funding under the HOME program. This includes services such as housing counseling in connection with TBRA and Affordable housing projects, energy auditing, preparation of work specifications, loan processing, inspections, tenant selection, management of TBRA, other services related to assisting owners, tenants, contractors and other entities participating or seeking to participate in the HOME program. Such assistance must also meet HOME income targeting requirements.	Governmental Agency or Non-profit
Affordable Housing	LMH	All Uses below as they relate to construction or rehabilitation of housing affordable to low-income households:	
Affordable Housing	LMH	Acquisition of Real Property	Governmental Agency or Non-profit
Affordable Housing	LMH	Disposition of property assisted with CDBG	Governmental Agency or Non-profit
Affordable Housing	LMH	Solid Waste Disposal Improvements	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only
Affordable Housing	LMH	Flood Drainage Improvements	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only
Affordable Housing	LMH	Water/Sewer Improvements	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only
Affordable Housing	LMH	Street Improvements	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only

**Exhibit 4: Funding Policies**

<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Affordable Housing	LMH	Sidewalks	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only
Affordable Housing	LMH	Tree Planting	If publicly owned land or to support rehab: Governmental Agency or Non-profit; if private to support new construction: CBDO only
Affordable Housing	LMH	Clearance, Demolition and Remediation	Governmental Agency or Non-profit
Affordable Housing	LMH	Cleanup of Contaminated Sites	Governmental Agency or Non-profit
Affordable Housing	LMH	Relocation	Governmental Agency or Non-profit
Affordable Housing	LMH	Rental Income Loss - Payments to housing owners for losses of rental income incurred in holding, for temporary periods, housing units to be used for the relocation of individuals and families displaced by CDBG eligible activities.	Governmental Agency or Non-profit
Affordable Housing	LMH	Energy Efficiency Improvements - includes installation of storm windows and doors, wall and attic insulation, and conversion, modification or replacement of heating and cooling equipment, including the use of solar energy equipment.	Governmental Agency or Non-profit
Affordable Housing	LMH	Residential Historic Preservation - authorizes the costs of preserving or restoring properties of historic significance that will be used for housing for low-income households.	Governmental Agency or Non-profit
Affordable Housing	LMH	Nonprofit Capacity Building - provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities. (The recipient must determine, prior to the provision of the assistance, that the activity for which it is attempting to build capacity would be eligible for CDBG assistance.	Governmental Agency or Non-profit
Affordable Housing	LMH	Assistance to Higher Education Institutions - any eligible activity can be provided to an institution of higher education when the grantee determines that such an institution has demonstrated a capacity to carry out activities that fall under one or more of the basic eligibility categories under the CDBG program	Governmental Agency or Non-profit
Affordable Housing	LMH	Operation and Repair of Foreclosed Property - authorizes activities necessary to make essential repairs and payment of operating expenses needed to maintain habitability of housing units acquired through tax foreclosure proceedings in order to prevent abandonment and deterioration of such housing in primarily low income neighborhoods.	Governmental Agency or Non-profit

**Exhibit 4: Funding Policies**

<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Non-Housing Community Development - Infrastructure systems and public facilities	various	Disposition of property assisted with CDBG	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Public Facilities or Improvements	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Senior Centers	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Handicapped Centers	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Youth Centers	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Neighborhood Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Parks, Recreational Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Parking Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Solid Waste Disposal Improvements	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Flood Drainage Improvements	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Water/Sewer Improvements	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Street Improvements	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Sidewalks	Governmental Agency or Non-profit
Non-Housing Community Development -	various	Child Care Centers	Governmental Agency or Non-profit

**Exhibit 4: Funding Policies**

<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Infrastructure systems and public facilities			
Non-Housing Community Development - Infrastructure systems and public facilities	various	Tree Planting	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Fire Station/Equipment	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Health Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Abused or Neglected Children Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Asbestos Removal	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Facilities for AIDS Patients	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Clearance, Demolition and Remediation	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Cleanup of Contaminated Sites	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Relocation	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Rental Income Loss - Payments to housing owners for losses of rental income incurred in holding, for temporary periods, housing units to be used for the relocation of individuals and families displaced by CDBG eligible activities.	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Privately Owned Utilities - acquire, construct, reconstruct, rehabilitate or install distribution lines and facilities of privately owned utilities, including the placing underground of new or existing distribution facilities and lines.	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Rehabilitation of Public or Privately Owned Commercial/Industrial buildings - some limitations for buildings owned by private for-profit business	Governmental Agency or Non-profit
Non-Housing Community Development -	various	Rehabilitation Administration: Rehabilitation services, such as rehabilitation counseling, energy	Governmental Agency or Non-profit

**Exhibit 4: Funding Policies**



<b>Consolidated Plan Goal Met</b>	<b>National Objective Code</b>	<b>CDBG Eligible Activity</b>	<b>Eligible Applicants</b>
Infrastructure systems and public facilities		auditing, preparation of work specifications, loan processing, inspections, and other services related to assisting owners, tenants, contractors, and other entities, participating or seeking to participate in rehabilitation activities.	
Non-Housing Community Development - Infrastructure systems and public facilities	various	Non-Residential Historic Preservation - authorizes the costs of preserving or restoring properties otherwise eligible as Public Facilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	various	Renovation of closed buildings - such as closed school buildings, for use as an eligible public facility	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	LMA or, if not applicable: LMC	Public Facility or improvements access projects that remove of material or architectural barriers that limit the accessibility of elderly persons or adults with severe disabilities	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities	LMA, LMJ, or, if neither apply: LMC	Rehabilitation of a privately owned nonresidential building or improvement that removes material or architectural barriers that limit the accessibility of elderly persons or adults with severe disabilities	Governmental Agency or Non-profit
Non-Housing Community Development - Micro-enterprise	various	<del>Micro-Enterprise Assistance: providing credit, including, but not limited to grants, loans, loan guarantees, and other forms of financial support, for the establishment, stabilization and expansion of microenterprises; providing technical assistance, advice and business support services to owners of microenterprises and persons developing microenterprises; providing general support including but not limited to peer support programs, counseling, childcare, transportation and other similar services to owners of microenterprises and persons developing microenterprises.</del>	<del>Governmental Agency, Non-profit or for-profit</del>
Non-Housing Community Development - Infrastructure systems and public facilities/ Non-Housing Community Development - microenterprise	various - must match eligible use	Nonprofit Capacity Building: provision of technical assistance to public or nonprofit entities to increase the capacity of such entities to carry out eligible neighborhood revitalization or economic development activities. (The recipient must determine, prior to the provision of the assistance, that the activity for which it is attempting to build capacity would be eligible for CDBG assistance.	Governmental Agency or Non-profit
Non-Housing Community Development - Infrastructure systems and public facilities/ Non-Housing Community Development - microenterprise	various - must match eligible use	Assistance to Higher Education Institutions - any eligible activity can be provided to an institution of higher education when the grantee determines that such an institution has demonstrated a capacity to carry out activities that fall under one or more for the basic eligibility categories under the CDBG program	Institution of Higher Education (Secondary and above)

**Exhibit 4: Funding Policies**

## HOME Eligible Activities

<b>Consolidated Plan Goal Met</b>	<b>HOME Eligible Activity</b>	<b>Eligible Applicants</b>
Affordable Housing and possibly Homelessness	Rental Assistance (Assistance to Developers of Rental Housing).	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Minimum set-aside of 15% for CHDOs. All development or TBRA expenses are eligible.	Community Housing Development Organizations
Affordable Housing and possibly Homelessness	New Construction: costs to meet applicable new construction standards	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Rehabilitation: To meet minimum property standards or to make essential improvements, including energy-related repairs or improvements, improvements necessary to permit use by persons with disabilities and the abatement of lead-based paint hazards. Rehabilitation includes conversion within the existing footprint of a building.	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Demolition of existing structures, associated with both new construction and rehabilitation	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Utility connections including off-site connections from property line to adjacent street, associated with both new construction and rehabilitation	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Improvements to project site in keeping with improvements of surrounding standard projects including on-site roads, and sewer and water lines.	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Refinancing for rehabilitation projects to permit continued affordability	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Acquisition: May use HOME funds to cover the costs of acquiring improved or unimproved real property	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Project Related Soft Costs reasonable and necessary costs associated with financing or development of new construction, rehab or acquisition including: Architectural, engineering or related services, costs to process or settle financing, cost of a project audit, costs to provide information services, cost of funding an initial operating deficit reserve, PJ staff and overhead costs directly related to carrying out the project, developer impact fees, costs of environmental review	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project, including Community Housing Development Organizations
Affordable Housing and possibly Homelessness	Relocation associated with development or rehabilitation of units	Non-profit or for-profit organization that will own, develop or sponsor a HOME-assisted project,

## Exhibit 4: Funding Policies

<b>Consolidated Plan Goal Met</b>	<b>HOME Eligible Activity</b>	<b>Eligible Applicants</b>
		including Community Housing Development Organizations
Affordable Housing and likely Homelessness	Tenant-Based Rental Assistance	Public agency or nonprofit organization
Affordable Housing and possibly Homelessness	CHDO Operating Costs - An individual CHDO may be used for operating costs of CHDO(s). An individual CHDO may receive no more than the lesser of 50% of its total operating costs or \$50,000. These funds are not part of the CHDO Set-Aside. These funds may be used for general operating assistance and may not be used or costs eligible under the CHDO Set-Aside.	Community Housing Development Organizations

## **APPENDIX B: INCOME LIMITS**

These income limits apply to HOME Investment Partnership Program (HOME) and Community Development Block Grant Program (CDBG) projects and programs and apply only to Sonoma County Community Development Commission-assisted projects or programs. They are not to be used as a guide for programs regulated by any agency other than the Sonoma County Community Development Commission. It is up to each property owner to determine which regulations preside if a program is regulated by more than one program.

Current Income Limits are found on the CDC website at the following link:

<http://sonomacounty.ca.gov/CDC/Housing-and-Neighborhood-Investment/Income-and-Rent-Limits/#federal>

## **APPENDIX C: RENT LIMITS**

These rent limits apply to HOME Investment Partnership Program (HOME) and Community Development Block Grant Program (CDBG) projects and programs and apply only to Sonoma County Community Development Commission-assisted units. They are not to be used as a guide for projects regulated by any agency other than the Sonoma County Community Development Commission. It is up to each property owner to determine which regulations preside if a unit is regulated by more than one program.

Property owners must subtract from the maximum rent the approved utility allowance for any utilities that the tenant pays in addition to the rent. Confirm the appropriate utility allowance with the Sonoma County Community Development Commission.

Current Rent Limits are found on the CDC website at the following link:

<http://sonomacounty.ca.gov/CDC/Housing-and-Neighborhood-Investment/Income-and-Rent-Limits/#federal>